



**Sprint Nextel**  
2001 Edmund Halley Dr.  
Reston VA 20191-3436  
Office: (703) 433-4248 Fax: (703) 433-4142

**Garnet Goins**  
Director, State Regulatory Northeast  
Region  
Email: Garnet.goins@sprint.com

**BY ELECTRONIC MAIL AND FEDERAL EXPRESS**

April 19, 2007



Debra A. Howland  
Executive Director and Secretary  
New Hampshire Public Utilities Commission  
21 S. Fruit Street, Suite 10  
Concord, NH 03301-2429

RE: Docket 06-067 – Petition of Freedom Ring Communications, LLC d/b/a BayRing Communications  
Complaint Against Verizon NH Regarding Access Charges

Dear Executive Director Howland,

Please find enclosed for filing an original and nine (9) copies of Sprint Communications Company, L.P. and Sprint Spectrum L.P.'s ("Sprint Nextel's") response to the Commission's request for financial data made in Order No. 24,705 (November 29, 2006) and subsequent letter, dated April 17, 2007, from Executive Director, Debra A. Howland, granting Sprint Nextel's Petition for Intervention.

Please return a filed-stamped copy of the enclosed filing to me in the enclosed self-addressed, postage-prepaid envelope. Thank you for your attention to this matter. If you have any questions concerning this request, please do not hesitate to contact me at (703) 433-4248.

Sincerely,

Garnet M. Goins

PROCESSING DIVISION  
APR 23 2007  
NHDR 74

## CERTIFICATE OF SERVICE

I, Jo-Ann G. Monroe, certify that I have served a true copy of Sprint Communications Company, L.P., and Sprint Spectrum. L.P.'s foregoing document in Docket 06-067 upon the parties of record in this proceeding by First Class U.S. Mail, postage prepaid, and/or Federal Express Overnight Delivery.

Dated at Reston, VA, April 19, 2007

Librarian  
New Hampshire Public Utilities Comm  
21 S. Fruit Street, Suite 10  
Concord, NH 03301-2420

Kate Bailey  
New Hampshire Public Utilities Comm  
21 S. Fruit Street, Suite 10  
Concord, NH 03301-2420

Lynn Fabrizio  
New Hampshire Public Utilities Comm  
21 S. Fruit Street, Suite 10  
Concord, NH 03301-2420

David Goyette  
New Hampshire Public Utilities Comm  
21 S. Fruit Street, Suite 10  
Concord, NH 03301-2420

Kath Mullholand  
New Hampshire Public Utilities Comm  
21 S. Fruit Street, Suite 10  
Concord, NH 03301-2420

Amanda Noonan  
Consumer Affairs Director  
New Hampshire Public Utilities Comm  
21 S. Fruit Street, Suite 10  
Concord, NH 03301-2420

Annmarie Berry  
Fairpoint New England  
155 Gannett Drive  
South Portland, MD 04106-6942

Gent Cav  
Otel Telekom Inc.  
One Sundial Avenue, Suite 210  
Manchester, NH 03103

Michelle Consalvo  
AT&T  
99 Bedford Street  
Boston, MA 02110

Frederick J. Coolbroth  
Devine Millimet & Branch  
49 N. Main Street  
P.O. Box 3610  
Concord, NH 03302

Victor D. del Vecchio  
Verizon New England  
185 Franklin Street, 13<sup>th</sup> Floor  
Boston, MA 02110-1585

Douglas S. Denny-Brown  
RNK Inc. d/b/a RNK Telecom  
333 Elm Street, Suite 310  
Dedham, MA 02026

Susan Geiger  
Orr & Reno PC  
One Eagle Square  
P.O. Box 3550  
Concord, NH 03302-3550

Shelia Gorman  
Verizon  
125 High Street  
Boston, MA 02110

Jay Gruber  
AT&T Communications of NE Inc.  
99 Bedford Street, Room 420  
Boston, MA 02111

Meredith A. Hatfield  
Office of Consumer Advocate  
21 S. Fruit Street, Suite 18  
Concord, NH 03301

Nancy Hubert  
Bretton Woods Telephone Co.  
Mt. Washington Place  
Bretton Woods, NH 03575

Nancy Jacobson  
One Communications  
24 Albion Road, Suite 230  
Lincoln, RI 02865

Jeremy L. Katz  
Segtel Inc.  
P.O. Box 610  
Lebanon, NH 03766

Gregory M. Kennan  
One Communications  
24 Albion Road, Suite 230  
Lincoln, RI 02865

Matthew T. Kinney  
RNK Inc.  
333 Elm Street, Suite 310  
Dedham, MA 02026

Debra A. Martone  
TDS Telecom  
P.O. Box 337  
11 Kearsarge Avenue  
Contoocook, NH 03229-0337

Stephen Nelson  
Dunbarton Telephone Co.  
2 Stark Highway South  
Dunbarton, NH 03045

John Nestor  
Verizon New Hampshire  
900 Elm Street, Suite 1927  
Manchester, NH 03101-2008

Penn Pfautz  
AT&T  
200 S. Laurel Avenue, Room E4-3A01  
Middletown, NJ 07748

Chris Rand  
Granite State Telephone  
600 South Stark Highway  
P.O. Box 87  
Weare, NH 03281

Mike Reed  
TDS Telecom  
24 Depot Square  
Northfield, VT 05663

Kevin M. Shea  
Verizon New Hampshire  
900 Elm Street, 19th Floor  
Manchester, NH 03101

Peter L. Shepherd  
Verizon New Hampshire  
125 High Street  
Boston, MA 02110

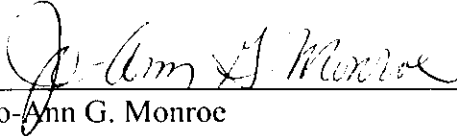
William Stafford  
Granite State Telephone  
600 South Stark Highway  
P.O. Box 87  
Weare, NH 03281

Ben Thayer  
Bayring Communications  
359 Corporate Drive  
Portsmouth, NH 03801-2888

Rojean Tulk  
Fairpoint Communications Inc.  
155 Gannett Drive  
South Portland, ME 04106-6942

Ann Walsh  
Dixville Telephone Co.  
One Cranberry Hill, Suite 105  
Lexington, MA 02421

Darren R. Winslow  
Union Communications  
13 Central Street  
Farmington, NH 03901

  
\_\_\_\_\_  
Jo-Ann G. Monroe

**STATE OF NEW HAMPSHIRE  
BEFORE THE  
PUBLIC UTILITIES COMMISSION**

<b>FREEDOM RING COMMUNICATIONS, LLC</b>	)	
<b>d/b/a BAYRING COMMUNICATIONS</b>	)	
	)	
<b>Complaint Against Verizon, New Hampshire Re:</b>	)	<b>DT 06-067</b>
<b>Access Charges</b>	)	
	)	
	)	

**SPRINT COMMUNICATIONS COMPANY, L.P. AND  
SPRINT SPECTRUM L.P.'S ESTIMATE OF IMPROPERLY BILLED VERIZON NEW  
HAMPSHIRE ACCESS CHARGES**

Sprint Communications Company, L.P. and Sprint Spectrum L.P. (collectively, "Sprint Nextel") hereby submits the following estimate of the general order of magnitude of the disputed charges billed by Verizon New Hampshire ("Verizon"), in accordance with Order No. 24,705 dated November 29, 2006. Sprint Nextel's estimate amount of improper access is based upon bills submitted to it by Verizon.<sup>1</sup>

To calculate this amount, Sprint Nextel compiled all the New Hampshire Intrastate Carrier Common Line ("CCL") charges invoiced to them by Verizon for the bill dates beginning with February 13, 2006. Sprint Nextel then excluded all end office locations identified by the Local Exchange Routing Guide ("LERG") to be owned by Verizon OCN 9102 and 5113 from the data. The remaining amount was determined to be transiting minutes of use and therefore, Sprint Nextel concluded that those CCL charges were improperly invoiced to Sprint Nextel.

---

<sup>1</sup> Sprint Nextel expressly reserves the right to refine this estimate and to supplement the estimate as well as supporting information if necessary.

The initial backclaim dispute of twenty four months consisted of eleven months of actual invoiced CCL charges as well as thirteen months of estimated CCL charges based upon an average amount from the invoiced data. This estimate was necessary due to a billing conversion that occurred and the time and expense to extract data from the older files. The claims going forward for subsequent CCL charges which continues to be invoiced to Sprint Nextel follows the same methodology to calculate the dispute as described above.

The attached work papers are submitted in support of Sprint Nextel's calculations. Sprint Nextel considers the information contained therein to be confidential, proprietary and competitively sensitive financial information and therefore is being submitted to the Commission only, pursuant to RSA 378:43.<sup>2</sup>

Respectfully submitted,

Sprint Communications Company L.P. and Sprint  
Spectrum, L.P.

A handwritten signature in dark ink, appearing to read "Garnet M. Goins", is written over a horizontal line.

Garnet M. Goins  
2001 Edmund Halley Drive  
Reston, VA 20191  
(703) 433-4248

Its Attorney

Dated: April 19, 2007

---

<sup>2</sup> The information or records provided are not general public knowledge or published elsewhere; measures have been taken to prevent dissemination of this information in the ordinary course of business. This information pertains to the provision of competitive services and contains confidential financial and commercial information, including geographic, market, vendor or product-specific data such as usage information not reflected in tariffs of general application.