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Attorneys for Union Telephone Company

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Petition of Qwest)
Corporation for Arbitration of an)
Interconnection Agreement with UNION) Docket No. 04-049-145
TELEPHONE COMPANY d/b/a UNION)
CELLULAR under Section 2252 of the)
Federal Telecommunications Act)

**UNION TELEPHONE COMPANY'S RESPONSE TO QWEST CORPORATIONS'
FIFTH SET OF DATA REQUESTS.**

Union Telephone Company responds as follows to the Fifth Set of Data Requests served by Qwest Corporation, all as follows:

RESPONSE TO DATA REQUESTS

Data Request 5-001:

In response to Qwest data request 1-017, Union states that it "previously supplied information to Qwest". Qwest has not received this information for purposes of the Utah arbitration. Qwest has asked for this information repeatedly. Please supply this information and any other information that is responsive to data request 1-017.

Response: Union's position is that it has "previously supplied" the information to Qwest,

nevertheless, notwithstanding the prior submittal, Union is attaching in electronic format, the information previously requested. The information provided is confidential and should be protected from public disclosure.

Data Request 5-002:

As Qwest requested in data request 4-004, produce a map or other document depicting the locations of each of the 325 cell sites included in Union's revised study. Union stated in response to DR 4-004 that it "will produce a listing of cell sites which identifies location if this is not presently in Qwest's possession". This information is not in Qwest's possession.

Response: Notwithstanding any previous objection that Union would retain, Union is attaching a listing of cell sites presently utilized by Union in the provision of wireless service. The information is confidential and should be kept from public disclosure.

Data Request 5-003:

In response to Qwest data request 4-006, Union stated that it "can produce a current coverage map which shows those cell sites existing as of the time of the map's creation". Produce the coverage map.

Response: Please find attached a current coverage map depicting Union's wireless coverage area.

Data Request 5-004:

In addition to housing equipment for Union's wireless BTS's, state whether any of Union's cell sites house, or otherwise serve or have an association with, equipment or attachments that serve or are owned by another telecommunications carrier or other type of provider. If the answer is yes, identify the equipment or attachments and the carriers or providers.

Response: Union objects to the data request as it is confusing, compound and irrelevant. Notwithstanding the objection, Union would state that it does provide services on tower sites that it might share with a leasing agreement with another telecommunications carrier. Generally, if a

tower site is shared with another carrier, there will be a leasing agreement in place that will allow for the use of the tower. As to the physical facilities, including any equipment or attachments, generally these are separated at the particular site and are not shared. What is shared is the physical location and the space rather than the equipment or attachments. A listing of such locations and companies is attached.

Data Request 5-005:

Of the total expenses in the Expenses tab of the 5-30-06 revised cost study, identify and explain how much of the expenses are associated with the 68 GSM-ONLY sites. Itemize these expenses at the same level of detail presently provided in column C of the Expenses tab.

Response: As to the data request, Union would state that such itemization has already been provided in previous submittals. Qwest should reference the “Expenses” tab of the cost study and direct its attention to the sub-accounts that begin with the number “8” which relate to “GSM – Only” sites. Also, as stated in Mr. Hendricks’ Supplemental Surrebuttal Testimony, Union’s employees still mistakenly assign GSM-related time and expenses to sub-account 3 (even though they should be assigned to sub-account 8) because sub-account 8 is a relatively new sub-account. Sub-account 3 expenses are also clearly delineated in the “Expenses” tab of the model.

Data Request 5-006:

Produce the spreadsheet provided by Union in response to data request 4-007 in an electronic format (Excel spreadsheet).

Response: Union objects to the request as the information and documentation relating to the request has previously been provided in an appropriate format. Notwithstanding the objection, Union would note that the continuing property records as previously provided are not maintained

in an Excel format.

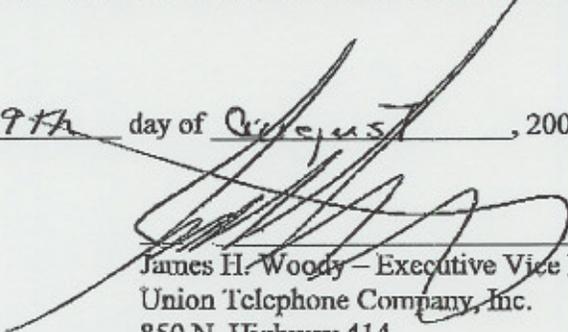
Data Request 5-007:

Of the total expenses in the Expenses tab of the 5-30-06 revised cost study, identify and explain:

- (a) How much of the expenses is related to the switch;
- (b) How much of the expenses is related to the BSC; and
- (c) How much of the expenses is related to the cell sites.

Response: Union objects to the request to the extent that it is not relevant to these proceedings or Union's cost study. Notwithstanding the objection, Union would note that it maintains its records in a way that captures the services, rather than switch expense, BSC expense or cell site expense. The information is not maintained in the categories requested by Qwest.

DATED this 29th day of August, 2006



James H. Woody - Executive Vice President
 Union Telephone Company, Inc.
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 Mountain View, WY 82939

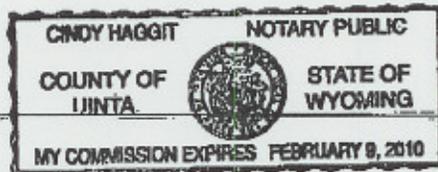
County of Uinta)
)
)
 State of Wyoming)

Subscribed and sworn before me this 29th day of August, 2006.

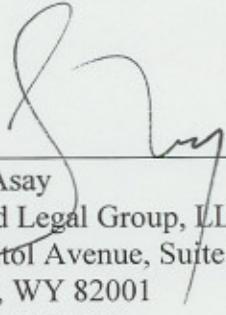
Cindy Haggit

My commission expires:

02/09/2010



As to objections:



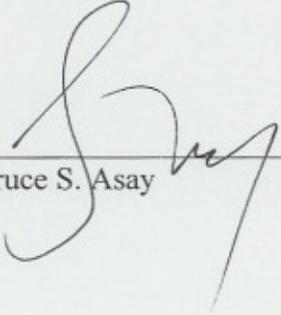
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served via electronic mail and/or first class mail (postage prepaid) on the 29th day of August, 2006, addressed as follows:

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