BEFORE THE
SOUTH CAROLINA PUBLIC SERVICE COMMISSION
DOCKET NOS. 2010-154-155-C

In the Matter of:	)	
	)	
Petition for Arbitration of	)	
Interconnection	)	
Agreement between Bellsouth	)	
Telecommunications, Incorporated	)	
d/b/a AT&T South Carolina and Sprint	)	
Spectrum L.P., Nextel South Corp. and	)	**JOINT MOTION ON PROCEDURE AND SCHEDULING**
NPCR, Inc. d/b/a Nextel Partners,	)	
Docket No. 2010-154-C	)	
	)	
Petition for Arbitration of	)	
Interconnection	)	
Agreement between Bellsouth	)	
Telecommunications, Incorporated	)	
d/b/a AT&T South Carolina and Sprint	)	
Communications Company L.P.	)	
Docket No. 2010-155-C	)	

On April 23, 2010, Bellsouth Telecommunications, Inc. d/b/a AT&T South Carolina ("AT&T South Carolina") filed the two above-captioned Petitions for Arbitration pursuant to Section 252(b) of the Telecommunications Act of 1996. AT&T South Carolina 's Petitions seek resolution of open issues arising out of the negotiation of interconnection agreements between AT&T South Carolina and Sprint Spectrum L.P., Nextel South Corp., and NPCF, Inc. d/b/a Nextel Partners (collectively, "Sprint CMRS") and between AT&T South Carolina and Sprint Communications Company L.P. ("Sprint CLEC"), respectively. On May 18, 2010, Sprint CMRS and Sprint CLEC jointly filed a Motion to Consolidate Arbitration Petitions and Responses to the arbitration petitions.

AT&T South Carolina or its affiliates (collectively "AT&T") have also filed or are planning to file for arbitration of these same issues against Sprint CMRS and Sprint CLEC in

multiple other jurisdictions. To date, AT&T has filed or intends to file for arbitration of these issues in nine other states, as described below, in addition to South Carolina. In order to most efficiently accomplish this litigation across these multiple jurisdictions, the Parties have agreed to the Procedural Schedule and other matters provided herein as one piece of the larger, coordinated multi-jurisdictional litigation process, and respectfully request the Hearing Officer consider the challenges of establishing a workable procedural schedule for multi-jurisdictional litigation in its review of the Procedural Schedule proposed by the Parties.

Consequently, the Parties hereby submit (a) a proposed discovery schedule (b) reiterate their proposed hearing dates as communicated to the Hearing Officer, and (c) provide a joint report to the Hearing Officer on (i) the status of their negotiations, (ii) the extent to which the parties have agreed on consolidation and the procedural matters raised in Sprint's Response and Motion to Consolidate and the extent to which the Commission must resolve those matters, and (iii) such additional matters (such as the filing of revised DPLs) as may be appropriate under the circumstances.

I. Proposed Discovery Schedule

In order to minimize the discovery burdens upon the Commission and other state Commissions, as well as the Parties, the Parties have agreed to the following regional discovery procedures applicable to the arbitration proceedings in South Carolina as well as the following jurisdictions: North Carolina, Georgia, Kentucky, Florida, Wisconsin, Tennessee, Alabama, Louisiana and Mississippi ("Arbitration Proceeding States"). The Parties respectfully request the Hearing Officer approve the following provisions applicable to the discovery process in an Order or Directive:

Discovery shall begin on the date of the Order or Directive. No new discovery requests shall be propounded after December 20, 2010 in preparation for the South Carolina arbitration

hearing, which the Parties propose to occur on February 22-24, 2011, and which dates are repeated below.

1. Written discovery shall be limited to a total of 100 distinct discovery requests of any type from each party for all arbitrations pending or to be filed in the Arbitration Proceeding States. Parts and subparts of a request shall be counted as separate requests. A given request shall be counted as a single request even though it may seek information regarding more than one Arbitration Proceeding State or (insofar as the Parties may be required to propound or file discovery in more than one state covered by the stipulation) has been propounded in more than one state.

2. The Parties believe written discovery, pre-filed testimony and the record through and including the arbitration hearings will create a sufficient record for the respective Commissions to render arbitration decisions and, therefore, agree that neither Party will initiate deposition discovery. If a Commission Staff or statutory advocate seeks deposition discovery despite the Parties' agreement not to initiate deposition discovery, the Parties will jointly request that such deposition discovery be coordinated with deposition discovery sought in any other state so that such discovery is:

    a. Limited to witnesses who have submitted testimony in the arbitration;
    b. Limited to one deposition per witness for all proceedings; and,
    c. Conducted at mutually acceptable locations, times and dates for witness depositions.

3. Responses to discovery propounded in one state (including discovery propounded by the Office of Regulatory Staff) shall be treated as if produced in all states covered by this stipulation. Any time before the close of the arbitration hearing record in a given state, either party may file and move for admission of discovery responses propounded in another state, and the non-filing party shall not object to the admission of such discovery on the basis that the discovery was propounded and answered in another state. Notwithstanding the foregoing, the Parties reserve their right to object to admissibility based on any other grounds.

4. Objections to discovery shall be served within 10 calendar days of service of the request.

5. Responses to discovery shall be served within 21 calendar days of service of the request.

6. Requests and responses shall be served electronically, with hard copies to follow.

7. The Parties agree to use a mutually acceptable regional protective agreement for use in the proceedings.

II. Proposed Hearing Dates and Procedural Schedule

As previously stated, the Parties are seeking, to the greatest extent possible, to

coordinate the hearing schedule across the Arbitration Proceeding States where AT&T has filed for arbitration of these same issues. The Parties thus respectfully request the Hearing Officer approve the following schedule for the conduct of this arbitration:

1. The proposed hearing dates are February 22 – February 24. Attorneys for the parties shall gather early on the first date of the hearing to discuss any outstanding procedural issues.

2. The Parties shall simultaneously prefile direct testimony no later than November 15, 2010.

3. The Parties shall simultaneously prefile rebuttal testimony no later than December 13, 2010

4. To the extent possible but contingent upon the receipt of the transcript, the Parties propose that post-hearing direct briefs be filed on March 21, 2011 and reply briefs be filed on April 21, 2011.

III. Status of negotiations

The Parties have conducted multi-hour, multi-days per week negotiations, which have resulted in resolution of a significant number of issues. Although there will still be significant substantive issues for arbitration, the Parties believe that as a result of the continuing negotiations the remaining disputed issues will be presented in more organized and understandable presentation for the benefit of the Commission and all participants in the proceeding.

The Parties have agreed to the following regarding preliminary matters:

- consolidation of Docket Nos. 2010-154-C and 2010-155-C;
- the use of a consolidated CMRS/CLEC DPL;
- separate CMRS and CLEC interconnection agreements to be executed as a result of the consolidated arbitration proceedings, as opposed to a single combined CMRS/CLEC interconnection agreement.

The Parties continue to work on finalizing DPL issues and language presentation; the parties expect filing a final DPL with Commission the week of July 26, 2010.

The Parties continue to engage in substantive negotiations in an effort to narrow the remaining points of disagreement that will require arbitration. The Parties are also currently engaged in coordinating the arbitration process and developing procedural schedules in nine states, in addition to South Carolina, where AT&T has filed or intends to file similar petitions for arbitration to the one filed in this case. In order to allow for the more efficient litigation of the issues put before the Commission in this case, the Parties coordinated scheduling and other procedural issues both in South Carolina as set forth above and in these other jurisdictions.

WHEREFORE, AT&T South Carolina and Sprint CMRS and CLEC respectfully request that the Hearing Officer approve the proposed discovery schedule and the proposed hearing dates as set forth above.

[signature page to follow]

Respectfully submitted this 16th day of July, 2010.

BELLSOUTH TELECOMMUNICATIONS, INC.
d/b/a AT&T SOUTH CAROLINA

s/Patrick W. Turner
Patrick W. Turner
BellSouth Telecommunications, Inc.
1600 Williams Street, Suite 5200
Columbia, South Carolina 29201
Telephone: (803) 401-2900
Fax: (803) 254-1731
pt1285@att.com

SPRINT SPECTRUM, L.P. d/b/a SPRINT PCS, NEXTEL SOUTH COPR., NCPR, INC. d/b/a NEXTEL PARTNERS, and SPRINT COMMUNITCATIONS COMPANY L.P.

s/John J. Pringle, Jr.
John J. Pringle, Jr.
Ellis, Lawhorne & Sims, P.A.
1501 Main Street, 5th Floor
P.O. Box 2285
Columbia, South Carolina 29202
Telephone: (803) 343-1270
Fax: (803) 799-8479
jpringle@ellislawhorne.com

BEFORE

THE PUBLIC SERVICE COMMISSION OF

SOUTH CAROLINA

DOCKET NOS. 2010-154-C and 2010-155-C

IN RE: Petition for Arbitration of Interconnection Agreement between Bellsouth Telecommunications, Incorporated d/b/a AT&T South Carolina and Sprint Spectrum L.P., Nextel South Corp. and NPCR, Inc. d/b/a Nextel Partners (collectively, "Sprint CMRS") **Docket No. 2010-154-C** Petition for Arbitration of Interconnection Agreement between Bellsouth Telecommunications, Incorporated d/b/a AT&T South Carolina and Sprint Communications Company L.P. ("Sprint CLEC") **Docket No. 2010-155-C**	))))))))))))))))))	**CERTIFICATE OF SERVICE**

This is to certify that I have caused to be served this day, one (1) copy of the July 16, 2010 Joint Motion on Procedure and Scheduling, via electronic mail addressed as follows:

<u>VIA ELECRONIC MAIL SERVICE</u>
Patrick W. Turner, Esquire
BellSouth Telecommunications, Inc.
1600 Williams Street
Suite 5200
Columbia, SC 29201

VIA ELECRONIC MAIL SERVICE
Shealy Boland Reibold, Esquire
Office of Regulatory Staff
Legal Department
PO Box 11263
Columbia, SC 29211

s/John J. Pringle, Jr.
John J. Pringle, Jr.

July 16, 2010
Columbia, South Carolina