

EXHIBIT D

Exhibit D

Data/Document Requests from IXCs

1. Produce all documents relating to access-stimulating CLEC invoices submitted to you, including all documents relating to your analysis, investigation, verification, payment, or dispute of such invoices, including, without limitation, documents sufficient to show which traffic was paid for in cases of partial payments of invoices. Include your definition of “access-stimulating” used to identify CLEC invoices.
2. Produce all documents that evidence, refer, or relate to any rate or price that the IXC has quoted and/or charged to any wholesale long distance customer in connection with delivering traffic to any access-stimulating CLEC from January 2012 to present.
3. Produce all documents that evidence, refer, or relate to any deposition, trial testimony, or written regulatory testimony that any employee or representative has given in any proceeding related to a claim by you that you did not owe access charges because a LEC was engaged in “access stimulation,” “mileage pumping” or “traffic pumping”, including any exhibits referenced in the testimony.
4. Produce documents sufficient to show the monthly volumes of the traffic delivered to an access-stimulating CLEC for each month from January 2011 to present. As in Question 1, provide your definition of “access-stimulating CLEC” used to identify this data. Provide the data in a manner that distinguishes between traffic originating from one of your affiliates and traffic carried by you on behalf of unaffiliated companies (*i.e.*, wholesale traffic).
5. Produce documents sufficient to show the revenue you earned from the monthly volumes of the traffic at issue that you carried as retail traffic; to the extent any such retail customers subscribed to an unlimited plan while making the calls at issue, produce documents sufficient to determine the average revenue per minute you have earned on a monthly basis from January 1, 2012 to present.
6. Produce documents sufficient to show the revenue you earned from the monthly volumes of the traffic at issue that you carried as wholesale traffic. Provide data sufficient to identify revenues paid by a wholesale customer, including the identity of the wholesale customer.
7. Produce documents sufficient to demonstrate the average monthly volume of domestic long-distance calls (in Minutes of Use) that subscribers to any unlimited long-distance plan have made from January 2012 to present.
8. Produce documents sufficient to demonstrate the total revenue you have received from any unlimited long-distance plan subscribers on a monthly basis, and the total number of subscribers of such unlimited long-distance plan for each such month, from January 2012 to present.

9. Produce any contracts or agreements between you and any CEA provider that has been in effect at any time since January 2012. Specifically with regard to AT&T, this request includes, but is not limited to, to the contract referred to in an email from Bob Hayes to Chris Burckhardt on November 12, 2014, which AT&T described as a September 14, 2014, Service Agreement with SDN for the purchase of Switched Access Transport – Terminating Service whereby AT&T purports to have obtained “High Volume Switching and Transport Service” (“HVSTS”) to transport switched access traffic from AT&T’s Point of Presence through SDN’s network for handoff to Northern Valley in Groton, S.D.
10. Produce all invoices from a CEA provider for the provision of transport services for traffic to/from an access-stimulating CLEC.
11. Identify each type of “access-stimulation” termination fee you assert you are or been charged by CLECs in 2009, 2010, 2011 and 2016, 2017. Provide data sufficient to show the average value of each category of termination fee you assert you are or have been charged in 2010 and 2016, 2017 and 2018.
12. Produce a list of all CLECs that you are currently withholding payment from based on allegations of access stimulation, including the unpaid balance. In addition, provide the date when you first began withholding payment based on allegations of access stimulation and the identity of the CLEC from whom you withheld payment.
13. Produce documents reflecting all long-distance plans offered between 2011 and 2018 and the cost consumers were charged for those plans. To the extent the offering is a bundled offering, include documents disclosing how much of the bundled price was attributed to long-distance service.
14. Produce any documents or evidence showing that, between 2011 and 2018, access stimulation was a factor in in how you set long distance rates. In addition, provide any public filings with, but not limited to, the U.S. Securities & Exchange Commission where you identify access-stimulation as adversely impacting your business or creating business risk.
15. Provide data on your investment in broadband deployment, by year, from 2010-2018. Provide separately all funding received from agencies of the U.S. government to subsidize or otherwise underwrite the cost of broadband deployment.
16. Provide documents sufficient to show planned investment in broadband, both 4G and 5G, from 2018-2020.
17. Provide data as to the number of minutes of service you handled each year from 2010-2018 by (a) fixed wireline origination, (b) wireless origination, (c) VoIP origination, (d) fixed wireline termination, (e) wireless termination, and (f) VoIP termination.

Data/Document Requests from CEA Providers

1. Produce documents sufficient to show the revenue you earned from IXCs for switching and/or transporting traffic to access-stimulating CLECs for the period January 1, 2012 to present.
2. Produce documents sufficient to show the monthly volumes of the traffic destined for access-stimulating CLECs that you switched with your tandem switch for the period January 1, 2012 to present. To the extent that some of the traffic was billed pursuant to contract and other of it was billed pursuant to tariff, provide the data in a manner that distinguishes the volumes by carrier and identifies whether the traffic was billed pursuant to contract or tariff.
3. Produce all documents exchanged between you and any member of affiliate regarding your position on whether CLECs should accept traffic from long-distance carriers through a direct IP interconnection.
4. Produce all Operating Agreements or other governing documents that relate to the duty of members and/or affiliates with regard to the routing of traffic that have been effective at any time after January 2012.
5. Produce any contracts or agreements between you and an IXC that were executed or amended in or after January 2012 that relate to the delivery of traffic to any access-stimulating CLEC on a contractual basis.
6. Produce all invoices from sent to any IXC as a result of a contract or agreement identified in response to the previous request from September 2012 forward.
7. Produce documents sufficient to identify the points of interconnection established between you and any members or affiliates, including documents showing who chose such points of interconnection and/or how they were chosen.
8. Produce documents sufficient to show how you calculated your access rates for federal tariff filings made in or after 2012, including, but not limited to, materials sufficient to understand whether traffic volumes destined for access-stimulating CLECs were included in those calculations.
9. Produce all documents that evidence, refer, or relate to any deposition, trial testimony, or written regulatory testimony that any employee or representative has given in any proceeding related to “access stimulation,” “mileage pumping” or “traffic pumping” or a CLECs’ failure to route all traffic through your tandem switch, including any exhibits referenced in the testimony.
10. Produce documents in your custody, possession or control that reflect either ownership or control of any transmission capacity that would be utilized on a call traveling from your tandem switch to an access-stimulating CLEC.

11. Produce copies of all documents that evidence, refer or relate to any changes that any access-stimulating CLEC made in the manner in which interexchange traffic was carried, routed or switched after January 2012.