STATE OF NEW HAMPSHIRE
BEFORE THE
PUBLIC UTILITIES COMMISSION

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

ESTIMATED DAMAGES OF SPRINT

Sprint Communications Company, L.P. and Sprint Spectrum L.P. (collectively "Sprint"), respectfully submits its this estimate of damages in the above-captioned proceeding as per the schedule announced at the November 5, 2008 technical session and memorialized in a November 5, 2008 letter filed with the New Hampshire Public Utilities Commission ("Commission") by Commission staff.

The spreadsheet attached as Exhibit 1 contains an estimate of damages, with supporting data of Sprint's damages resulting from improper assessment of carrier common line charges by Verizon from April 2002 – March 2008.

The spreadsheet attached as Exhibit 2 contains an estimate of damages, with supporting data of Sprint's damages resulting from improper assessment of carrier common line charges by FairPoint from April 2008 – the present.

Sprint requests that Exhibits 1 and 2 be treated confidentially pursuant to R.S.A. § 365:43. The information contained in Exhibits 1 and 2 is not publicly available, not published elsewhere, is subject to measures intended to prevent its release or dissemination outside the company, is available only to a limited number of employees of the company, and pertains to the provision of competitive services within New Hampshire.

Respectfully submitted,

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Dated: December 19, 2008

Exhibit One

Verizon

Sprint Estimate Of Amount Due

Vendor Name	Bill Date	CCL Rate Rate	CCL Quantity	LS Quantity	Diff in Quan	Overbilled amount
VERIZON	5/13/2004	0.026494	4220354	3657458	562896	$ 14,913.37
VERIZON	6/13/2004	0.026494	4152987	3627936	525051	$ 13,910.70
VERIZON	7/13/2004	0.026494	3971988	3450392	521596	$ 13,819.16
VERIZON	8/13/2004	0.026494	4226249	3657041	569208	$ 15,080.60
VERIZON	9/13/2004	0.026494	4064887	3457390	607497	$ 16,095.03
VERIZON	10/13/2004	0.026494	4153541	3568770	584771	$ 15,492.92
VERIZON	11/13/2004	0.026494	4104295	3501135	603160	$ 15,980.12
VERIZON	12/13/2004	0.026494	3735427	3169224	566203	$ 15,000.98
VERIZON	1/13/2005	0.026494	3755647	3206179	549468	$ 14,557.61
VERIZON	2/13/2005	0.026494	3975684	3392349	583335	$ 15,454.88
VERIZON	3/13/2005	0.026494	3854679	3193274	661405	$ 17,523.26
VERIZON	4/13/2005	0.026494	4384879	3571541	813338	$ 21,548.58
VERIZON	5/13/2005	0.026494	4158289	3326694	831595	$ 22,032.28
VERIZON	6/13/2005	0.026494	3937690	3156700	780990	$ 20,691.55
VERIZON	7/13/2005	0.026494	3937564	3141841	795723	$ 21,081.89
VERIZON	8/13/2005	0.026494	4084745	3228447	856298	$ 22,686.76
VERIZON	9/13/2005	0.026494	3936108	3064196	871912	$ 23,100.44
VERIZON	10/13/2005	0.026494	4070643	3173776	896867	$ 23,761.59
VERIZON	11/13/2005	0.026494	4257521	3266471	991050	$ 26,256.88
VERIZON	12/13/2005	0.026494	4034585	3111672	922913	$ 24,451.66
VERIZON	1/13/2006	0.026494	3945581	3067809	877772	$ 23,255.69
VERIZON	2/13/2006	0.026494	4089019	3145108	943911	$ 25,007.98
VERIZON	3/13/2006	0.026494	3428917	2797091	631826	$ 16,739.60
VERIZON	4/13/2006	0.026494	3652177	3041811	610366	$ 16,171.04
VERIZON	5/13/2006	0.026494	3360413	2762696	597717	$ 15,835.91
VERIZON	6/13/2006	0.026494	3477229	2761283	715946	$ 18,968.27
VERIZON	7/13/2006	0.026494	3413279	2614376	798903	$ 21,166.14
VERIZON	8/13/2006	0.026494	3559597	2705476	854121	$ 22,629.08
VERIZON	9/13/2006	0.026494	4970744	2626401	2344343	$ 62,111.02
VERIZON	10/13/2006	0.026494	4647435	2586343	2061092	$ 54,606.57
VERIZON	11/13/2006	0.026494	6256366	2672638	3583728	$ 94,947.29
VERIZON	12/13/2006	0.026494	4161140	2605521	1555619	$ 41,214.57
VERIZON	1/13/2007	0.026494	4334234	2512881	1821353	$ 48,254.93
VERIZON	2/13/2007	0.026494	4564311	2730407	1833904	$ 48,587.45
VERIZON	3/13/2007	0.026494	4027951	2611020	1416931	$ 37,540.17
VERIZON	4/13/2007	0.026494	4440424	2907605	1532819	$ 40,610.51
VERIZON	5/13/2007	0.026494	4191068	2558811	1632257	$ 43,245.02
VERIZON	6/13/2007	0.026494	4252664	2582076	1670588	$ 44,260.56
VERIZON	7/13/2007	0.026494	3871249	2463125	1408124	$ 37,306.84
VERIZON	8/13/2007	0.026494	3989853	2509862	1479991	$ 39,210.88
VERIZON	9/13/2007	0.026494	4072251	2537217	1535034	$ 40,669.19
VERIZON	10/13/2007	0.026494	3745349	2350010	1395339	$ 36,968.11
VERIZON	11/13/2007	0.026494	3075350	1973280	1102070	$ 29,198.24
VERIZON	12/13/2007	0.026494	3380069	2342839	1037230	$ 27,480.37
VERIZON	1/13/2008	0.026494	3327051	2303170	1023881	$ 27,126.70
VERIZON	2/13/2008	0.026494	3508005	2412911	1095094	$ 29,013.42
VERIZON	3/13/2008	0.026494	3556877	2582194	974683	$ 25,823.25
					Total Overcharges	$ 1,341,389.05
					Shortpaid Disputes	$ 580,297.84
					Penalty Charges	$ 193,051.92
					Credit Received	$ -
					Amount Due	$ 1,534,440.97

Calculation of NH Intrastate CCL Dispute Amounts Billed		
Based on Billed Data from CARD		
All carriers retroactive to May 2004		
Account	**Disputed CCL**	
	MOUs	**Revenue**
AT&T		
SPRINT	49,687,532	$ 1,316,421
ONE COMMUNICATIONS		
XO COMMUNICATIONS		
GLOBAL CROSSING		
FREEDOM RING COMMUNICATIONS		
WAVE2WAVE		
G4 COMMUNICATIONS		
OTHER		
Total		

Calculation of NH Intrastate CCL Dispute Amounts Billed					
Based on Billed Data from CARD			**SPRINT**		
Summary					
Revenue Impact for May 2004 through Feb 2008				**$ 1,316,421**	
Monthly Calculation					
	CCL Rate		$0.026494		
					Note:
					LS
Month	**CCL MOUs**	**LS MOUs**	**MOU Diff.**	**Revenue Impact**	Adj
May-04	4,220,354	3,657,458	562,896	$ 14,913	
Jun-04	4,152,987	3,627,936	525,051	$ 13,911	
Jul-04	3,971,988	3,450,392	521,596	$ 13,819	
Aug-04	4,226,249	3,657,041	569,208	$ 15,081	
Sep-04	4,064,887	3,475,390	589,497	$ 15,618	
Oct-04	4,153,541	3,568,770	584,771	$ 15,493	
Nov-04	4,104,295	3,501,135	603,160	$ 15,980	
Dec-04	3,735,427	3,169,224	566,203	$ 15,001	
Jan-05	3,755,647	3,206,179	549,468	$ 14,558	
Feb-05	3,975,684	3,392,349	583,335	$ 15,455	
Mar-05	3,854,679	3,193,274	661,405	$ 17,523	
Apr-05	4,384,879	3,571,541	813,338	$ 21,549	
May-05	4,158,289	3,326,694	831,595	$ 22,032	
Jun-05	3,937,690	3,156,700	780,990	$ 20,692	
Jul-05	3,973,564	3,141,841	831,723	$ 22,036	
Aug-05	4,084,745	3,228,447	856,298	$ 22,687	
Sep-05	3,936,108	3,064,196	871,912	$ 23,100	
Oct-05	4,070,643	3,173,776	896,867	$ 23,762	
Nov-05	4,257,521	3,266,471	991,050	$ 26,257	
Dec-05	4,034,585	3,111,672	922,913	$ 24,452	
Jan-06	3,945,581	3,067,809	877,772	$ 23,256	
Feb-06	4,096,658	3,152,777	943,881	$ 25,007	
Mar-06	3,435,789	2,803,993	631,796	$ 16,739	
Apr-06	3,659,861	3,049,531	610,330	$ 16,170	
May-06	3,368,056	2,770,365	597,691	$ 15,835	
Jun-06	3,485,179	2,769,267	715,912	$ 18,967	
Jul-06	3,421,066	2,622,200	798,866	$ 21,165	
Aug-06	3,567,861	2,713,783	854,078	$ 22,628	
Sep-06	4,980,697	2,636,383	2,344,314	$ 62,110	
Oct-06	4,657,463	2,596,405	2,076,264	$ 55,009	(15,206)
Nov-06	6,266,816	2,683,117	3,583,699	$ 94,947	
Dec-06	4,171,104	2,615,516	1,555,588	$ 41,214	
Jan-07	4,344,410	2,523,091	1,821,319	$ 48,254	
Feb-07	4,574,986	2,741,127	1,833,859	$ 48,586	
Mar-07	4,037,788	2,620,891	1,416,897	$ 37,539	
Apr-07	4,451,734	2,918,957	1,532,777	$ 40,609	
May-07	4,202,188	2,569,967	1,632,221	$ 43,244	
Jun-07	4,263,290	2,592,735	1,670,555	$ 44,260	
Jul-07	3,881,163	2,473,073	1,408,090	$ 37,306	
Aug-07	4,000,129	2,520,187	1,479,942	$ 39,210	
[illegible]	[illegible]	[illegible]	[illegible]	$ [illegible]	

[illegible]	[illegible]	[illegible]	[illegible]	$	[illegible]
Sep-07	4,082,623	2,547,625	1,534,998	$	40,668
Oct-07	3,755,213	2,359,908	1,395,305	$	36,967
Nov-07	3,085,583	1,983,563	1,102,020	$	29,197
Dec-07	3,389,384	2,352,210	1,037,174	$	27,479
Jan-08	3,336,428	2,312,581	1,023,847	$	27,126
Feb-08	3,517,196	2,422,135	1,095,061	$	29,013
Total	**185,032,008**	**135,359,682**	**49,687,532**	**$**	**1,316,421**

Exhibit Two

FairPoint

Sprint Estimate Of Amount Due

Vendor Name	Bill Date	CCL Rate Rate	CCL Quantity	LS Quantity	Diff in Quan	Overbilled amount	
FAIRPOINT COMMUNICATIONS	4/13/2008	0.026494	3709833	2609311	1100522	$	29,157.23
FAIRPOINT COMMUNICATIONS	5/13/2008	0.026494	3301267	2099122	1202145	$	31,849.63
FAIRPOINT COMMUNICATIONS	6/13/2008	0.026494	3759810	2200763	1559047	$	41,305.39
					Total Overcharges	$	102,312.25
					Shortpaid Disputes	$	87,939.46
					Penalty Charges	$	-
					Credit Received	$	(73,359.85)
					Amount Due	$	28,952.40

CERTIFICATE OF SERVICE

I, Benjamin Aron, certify that I have served a true copy of Sprint Communications Company, L.P. and Sprint Spectrum L.P.'s foregoing document (with Exhibit 1 only served on Verizon and Exhibit 2 only served on Fairpoint) in Docket 06-067 upon the parties listed below by First Class Mail, postage prepaid, on this 19th day of December, 2008.

Served with Exhibit 1:

SARAH B. KNOWLTON, ESQUIRE
100 MARKET STREET
P.O. BOX 459
PORTSMOUTH, NEW HAMPSHIRE 03802

ALEXANDER W. MOORE, ESQUIRE
VICTOR D. DEL VECCHIO, ESQUIRE
VERIZON NEW ENGLAND, INC.
185 FRANKLIN STREET, 13TH FLOOR
BOSTON, MA 02110-1585

PETER L SHEPHERD
VERIZON NEW HAMPSHIRE
125 HIGH ST
BOSTON MA 02110

Served with Exhibit 2:

ANNMARIE BERRY
FAIRPOINT NEW ENGLAND
155 GANNETT DR
SOUTH PORTLAND ME 04106-6942

SHIRLEY J LINN
FAIRPOINT COMMUNICATIONS INC
521 E MOREHEAD ST STE 250
CHARLOTTE NC 28202

MICHAEL J MORRISSEY
FAIRPOINT COMMUNICATIONS INC
521 E MOREHEAD ST STE 250
CHARLOTTE NC 28202

JOHN NESTOR III
FAIRPOINT COMMUNICATIONS INC
900 ELM ST STE 1927

MANCHESTER NH 03101-2008

KEVIN M SHEA
FAIRPOINT COMMUNICATIONS INC
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ROJEAN TULK
FAIRPOINT COMMUNICATIONS INC
155 GANNETT DR
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Benjamin J. Aron