

LAW OFFICES
RITER, ROGERS, WATTIER & BROWN, LLP
Professional & Executive Building
319 South Coteau Street
P.O. Box 280
Pierre, South Dakota 57501-0280
www.riterlaw.com

OF COUNSEL:
Robert D. Hofer
E. D. Mayer
TELEPHONE
605-224-5825
FAX
605-224-7102

ROBERT C. RITER, Jr.
DARLA POLLMAN ROGERS
JERRY L. WATTIER
JOHN L. BROWN

MARGO D. NORTHRUP, Associate

July 12, 2005

Philip R. Schenkenberg
Briggs and Morgan, P.A.
2200 IDS Center
80 South Eighth Street
Minneapolis, MN 55402

RECEIVED

JUL 13 2005

**SOUTH DAKOTA PUBLIC
UTILITIES COMMISSION**

Re: Verizon Wireless vs. PUC
Civil Number 04-3014
Our File Number 04-181

Dear Phil:

Enclosed herein you will find the INITIAL DISCLOSURE of Intervenor to Plaintiff in the above-entitled matter.

Sincerely yours,



Darla Pollman Rogers
Attorney at Law

DPR/ph

Enclosure

CC: Rolayne Ailts Wiest (with enclosure)
Gene Lebrun (with enclosure)
Rich Coit (with enclosure)

SEARCHED

INDEXED

SERIALIZED

FILED

JUL 13 2005

LAW OFFICES
RITER, ROGERS, WATTIER & BROWN, LLP
Professional & Executive Building
319 South Coteau Street
P.O. Box 280
Pierre, South Dakota 57501-0280
www.riterlaw.com

ROBERT C. RITER, Jr.
DARLA POLLMAN ROGERS
JERRY L. WATTIER
JOHN L. BROWN

MARGO D. NORTHRUP, Associate

RECEIVED

JUL 13 2005

**SOUTH DAKOTA PUBLIC
UTILITIES COMMISSION**

OF COUNSEL:
Robert D. Hofer
E. D. Mayer
TELEPHONE
605-224-5825
FAX
605-224-7102

July 12, 2005

Kathy Hammond
United States Clerk of Court
225 South Pierre St., #405
Pierre, South Dakota 57501

Re: Verizon Wireless vs. PUC
Civil Number 04-3014
Our File Number 04-181

Dear Kathy:

Enclosed herein you will find the original and one copy of the Certificate of Service of the INITIAL DISCLOSURE of Intervenors to Plaintiff for filing in the above-entitled matter.

Sincerely yours,



Darla Pollman Rogers
Attorney at Law

DPR/ph

Enclosures

CC: Rolayne Ailts Wiest (with enclosure)
Gene Lebrun (with enclosure)
Rich Coit (with enclosure)
Philip Schenkenberg (with enclosure)

RECEIVED

JUL 13 2005

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
CENTRAL DIVISION

**SOUTH DAKOTA PUBLIC
UTILITIES COMMISSION**

Verizon Wireless (VAW) LLC,
CommNet Cellular License Holding, LLC,
Missouri Valley Cellular, Inc.,
Sanborn Cellular, Inc., and
Eastern South Dakota Cellular, Inc.,
d/b/a VERIZON WIRELESS,

Plaintiff,

Vs.

Bob Sahr, Gary Hanson, and Dustin Johnson, in their official capacities as the Commissioners of the South Dakota Public Utilities Commission,

Defendant,

South Dakota Telecommunications Ass'n
and Venture Communications Cooperative,

Intervenors.

Civil Number 04-3014

INITIAL DISCLOSURE
UNDER RULE 26(a)

In accordance with Rule 26(a)(1) of the Federal Rules of Civil Procedure, Bob Sahr, Gary Hanson, and Jim Burg, in their official capacities as the Commissioners of the South Dakota Public Utilities Commission, Defendant, and South Dakota Telecommunications Ass'n and Venture Communications Cooperative, Intervenors, make their mandatory disclosure as follows:

A. Witnesses:

1. Larry Thompson, consultant on behalf of Intervenors, of Vantage Point Solutions, 1801 North Main, Mitchell, South Dakota, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment, including information supporting the constitutionality of Chapter 284 and information refuting preemption under 47 U.S.C. 332 and 47 C.F.R. 2011.

2. Randy W. Houdek, General Manager of Venture Communications Cooperative, 218 Commercial S.E., Highmore, South Dakota, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment, including information supporting the constitutionality of Chapter 284 and information refuting preemption under 47 U.S.C. 332 and 47 C.F.R. 2011.
 3. Randy Olson, Assistant General Manager of Venture Communications Cooperative, 218 Commercial S.E., Highmore, South Dakota, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment, including information supporting the constitutionality of Chapter 284 and information refuting preemption under 47 U.S.C. 332 and 47 C.F.R. 2011.
 4. Chuck Fejfar, Senior Manager of Network Operations, South Dakota Network, LLC, 2900 W. 10th Street, Sioux Falls, SD 57104, is likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless used solely for impeachment, including information supporting the constitutionality of Chapter 284 and information refuting preemption under 47 U.S.C. 332 and 47 C.F.R. 2011.
- B. Documents, data compilations, and tangible things that the disclosing party may use or rely upon to support its claims or defenses, unless used solely for impeachment, including information supporting the constitutionality of Chapter 284 and information refuting preemption under 47 U.S.C. 332 and 47 C.F.R. 2011.

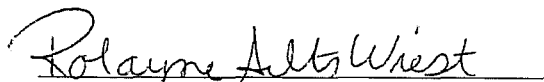
Description by Category:	Location:
1. Billing records of Verizon minutes	Venture Communications
2. Terminating call AMA records	Venture Communications
3. Terminating usage reports	Venture Communications
4. SS7 records	SDN / Vantage Point
5. Interconnecting carrier EMI records	Venture Communications
6. Inet SS7 protocol analyzer	SDN
7. Resource documents:	
(a) Tekelec AIS Technical and Administration Manuals	SDN

- (b) Tekelec Eagle SAS SS7 Signaling Transfer Point Technical and Administration Manuals SDN
- (c) Alcatel Megahub SS7 Signaling Transfer Point Technical and Administration Manuals SDN
- (d) Northern Telecom MTX Technical and Administration Manuals Vantage Point
- (e) Northern Telecom DMS-100/500 Technical and Administration Manuals SDN
- (f) Telcordia Notes on the Networks (SR-2275) Vantage Point
- (g) Telcordia GR-1083 Generic Requirements for Exchange Access Automatic Message Accounting (AMA), FSD 20-25-0000 Vantage Point
- (h) Various Telcordia Generic Requirements, including GR-246, GR-1087, GR-1432, and GR-1509 Vantage Point
- (i) Tekno Telecom Net(s)CCS SS7 Network Analyzer Technical and Administration Manuals SDN
- (j) Various ATIS Documents, including NIIF Reference Document Part III - Installation and Maintenance Responsibilities for SS7 Links and Trunks ATIS-0300011 Vantage Point
- (k) ATIS Ordering and Billing Forum Documents Vantage Point
- (l) Signaling System #7, Travis Russell, McGraw-Hill Company Vantage Point
- (m) ANSI Standards, including T1.110-1999, T1.111-1996, T1.112-1996, T1.113-1995, T1.114-1996, T1.116-1996, T1.116A-1998, T1.118-1992, T1.226-1992, T1.234-2000, T1.235-2000, T1.236-2000, T1.611-1991 (R1997), T1.631-1993, T1.648-1995, Vantage Point

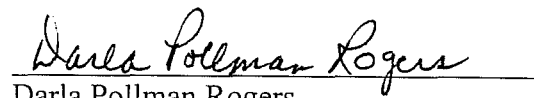
T1.651-1996(R2001), T1.651a-
1996(R2001), T1.655-1996, T1.656-1996,
T1.657-1996, T1.658-1996, T1.659-
1996(R2001), T1.660-1998, T1.661-2000,
T1.666-1999, T1.668-1999, T1.669-1999,
T1.671-2000

Defendant has not yet identified any witnesses or documents, but may use some or all of the same witnesses and documents that are listed above.

Dated this twelfth day of July, 2005.



Rolayne Ailts Wiest
South Dakota Public Utilities Comm.
500 East Capitol
Pierre, South Dakota 57501-5070
Telephone (605) 773-3201
Attorney for Defendant



Darla Pollman Rogers
Riter, Rogers, Wattier & Brown, LLP
P. O. Box 280
Pierre, South Dakota 57501
Telephone (605) 224-7889
Attorney for Intervenors

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
CENTRAL DIVISION

Verizon Wireless (VAW) LLC,
CommNet Cellular License Holding, LLC,
Missouri Valley Cellular, Inc.,
Sanborn Cellular, Inc., and
Eastern South Dakota Cellular, Inc.,
d/b/a VERIZON WIRELESS,

Plaintiff,

Vs.

Bob Sahr, Gary Hanson, and Dustin Johnson,
in their official capacities as the
Commissioners of the South Dakota Public
Utilities Commission,

Defendant,

South Dakota Telecommunications Ass'n
and Venture Communications Cooperative,

Intervenors.

Civil Number 04-3014

CERTIFICATE OF SERVICE

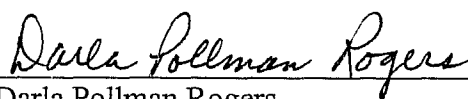
I hereby certify that a true and correct copy of the INITIAL DISCLOSURE was served via the method(s) indicated below, on the twelfth day of July, 2005, addressed to:

Rolayne Ailts Wiest, General Counsel	<input checked="" type="checkbox"/>	First Class Mail
South Dakota Public Utilities Commission	<input type="checkbox"/>	Hand Delivery
500 East Capitol Avenue	<input type="checkbox"/>	Facsimile
Pierre, South Dakota 57501	<input type="checkbox"/>	Overnight Delivery
	<input type="checkbox"/>	E-Mail
Gene N. Lebrun	<input checked="" type="checkbox"/>	First Class Mail
Steven J. Oberg	<input type="checkbox"/>	Hand Delivery
Lynn, Jackson, Shultz & Lebrun	<input type="checkbox"/>	Facsimile
P. O. Box 8250	<input type="checkbox"/>	Overnight Delivery
Rapid City, South Dakota 57709	<input type="checkbox"/>	E-Mail

Philip R. Schenkenberg
Briggs and Morgan, P.A.
2200 IDS Center
80 South Eighth Street
Minneapolis, MN 55402

First Class Mail
 Hand Delivery
 Facsimile
 Overnight Delivery
 E-Mail

Dated this twelfth day of July, 2005.



Darla Pollman Rogers
Riter, Rogers, Wattier & Brown, LLP
P. O. Box 280
Pierre, South Dakota 57501
Telephone (605) 224-7889
Fax (605) 224-7102