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**Licensed only in Colorado

February 25, 2004

VIA FACSIMILE

Linden R. Evans 605-721-2550
Black Hills Corporation
P.O. Box 1400
Rapid City, SD 57709

Kelly Frazier 605-773-3809
SD Public Utilities Commission
500 East Capitol
Pierre, SD 57501

Marvin D. Truht 605-721-2550
P.O. Box 8112
Rapid City, SD 57709

Re: In the Matter of the Complaint Filed by Black Hills FiberCom, L.L.C., Rapid City, South Dakota Against Qwest Corporation Regarding Intrastate Switched Access Charges Applied to ISP-Bound Calls Which Complainant Claims is Interstate in Nature
TC03-154 (Our File No. 2104.129)

Dear Counsel:

Please find enclosed a copy of Qwest's Combined Requests for Admissions, Interrogatories and Request for Documents (Third Set) and Certificate of Service in this matter. This is intended as personal service upon you via facsimile.

Sincerely yours,

BOYCE, GREENFIELD, PASHBY & WELK, L.L.P.



Thomas J. Welk

TJW/vjj

Enclosure

cc: (via email) Tim Goodwin
Larry Toll
Jon Lehner

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TRANSMITTAL

BGPW # 2104.129

TO: Linden Evans 605-721-255 0
Marvin Truhe 605-721-2550
Kelly Frazier 605-773-3809

FROM: Tom Welk

DATE: February 25, 2004

RE: Black Hills FiberCom/Qwest (CT03-154)

PAGES: 7 (including cover sheet)

COMMENTS:

IMPORTANT NOTICE

This message is intended only for the use of the individual entity to which it is addressed, and may contain information that is privileged, confidential, and exempt from disclosure under applicable law. If the reader of this message is not the intended recipient, or the employee or agent responsible for delivering the message to the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone and return the original message to us at the above address via the U.S. Postal Service. Thank you.

IF YOU HAVE ANY PROBLEMS RECEIVING THIS FACSIMILE, PLEASE
CONTACT : Vera J. Jongeling @ 605-336-2424.

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**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA**

**In the Matter of the Complaint Filed by
Black Hills FiberCom, L.L.C., Rapid City,
South Dakota Against Qwest Corporation
Regarding Intrastate Switched Access
Charges Applied to ISP-Bound Calls Which
Complainant Claims is Interstate in Nature**

CT 03-154

**QWEST'S COMBINED REQUESTS
FOR ADMISSIONS,
INTERROGATORIES AND REQUESTS
FOR PRODUCTION (THIRD SET)**

**TO: BLACK HILLS FIBERCOM, LLC AND ITS ATTORNEYS, LINDEN R. EVANS AND
MARVIN D. TRUHE:**

Qwest Corporation ("Qwest"), pursuant to ARSD 20:10:01:22.02 and SDCL 15-6-36 and SDCL 15-6-33, propounds the following written requests for admissions, interrogatories and document requests to Black Hills FiberCom, LLC ("BHFC"), for answer under oath within thirty (30) days of the service hereof. These interrogatories and document requests shall be deemed continuing in nature, requiring BHFC to supplement said interrogatories or document requests when BHFC, its agent or attorney obtains information in addition to or different from any information provided in BHFC's original answers to the interrogatories or responses to document requests.

You are reminded that your answers must include all information available not only to you, but also available to your agents, attorneys, insurers, or others who have information available to you upon your inquiry of them.

In these interrogatories and document requests to you, the following definitions and instructions apply. Note that when documents are identified (as defined in Definition No. 3 below), there is an automatic demand for production, made pursuant to SDCL 15-6-34 (with an option to you to produce copies in lieu of the formal inspection).

DEFINITIONS AND INSTRUCTIONS

1. "You" or "your" shall refer to Black Hills FiberCom, LLC and any of your agents, representatives, or employees.

2. "Person" shall be deemed to mean the plural as well as the singular, any natural person, firm, association, partnership, corporation, or other form of legal entity or governmental body, and its agents, officers, directors, or employees, unless the context requires otherwise.

3. "Document" shall mean the original and any copy of any written, typed, printed, recorded, or graphic matter of any kind, however produced or reproduced, including, but not limited to, letters or other correspondence, telegrams, memoranda, reports, notes, summaries, tabulations, work papers, cost sheets, cancelled checks, financial reports and statements, motion picture films, bookkeeping and accounting records of all types, photographs, advertisements, tape recordings, micro film, and other data compilations including computer data.

4. "Identify" means, with respect to a natural person, to set forth, on the first occasion that such person is identified, the following information, as far as known to you:

- (a) Full name;
- (b) Job title and employer at the time of the events complained of in the complaint in this lawsuit;
- (c) Present or last known residence address and telephone number;
- (d) Present or last known job title and business address;
- (e) Present or last known employer; and
- (f) Employment history with you, if any, of such person.

5. "Identify" means, with respect to any entity other than a natural person, to set forth the full name or title of the entity, and, on the first occasion as such entity is identified, to also state the address and principal place or activity of such entity.

6. "Identify" means, with respect to an oral communication or other event, to set forth the following information:

- (a) Its general nature (e.g., telephone call, conference, luncheon, etc.);
- (b) The date it occurred and the time;
- (c) The place it occurred;
- (d) For a communication, the identity of each originator and recipient; for an event, the identity of each person present; and
- (e) The identity of all persons present when the communication or event occurred.

7. "Date" means the exact day, month, and year, if ascertainable; if not, the closest approximation that can be made thereto.

8. "Knowledge" includes first-hand knowledge and information derived from any other source.

9. "ISP Customer" refers to an internet service provider that obtains access to the public switched telephone network from BHFC, Qwest, or another carrier. The "ISP Customer's Customers" refers to the customers of the ISP who dial access numbers assigned to the ISP in order to access the internet.

10. "Traffic in dispute" refers to traffic initiated by BHFC customers outside Qwest's Rapid City local calling area and delivered to an ISP Customer of Qwest within Qwest's Rapid City local calling area.

REQUESTS FOR ADMISSION**Request for Admission 1:**

Admit that the traffic in dispute enters BHFC's customer network at a point within the same state as that in which the called station is situated.

ADDITIONAL INTERROGATORIES**Interrogatory 1:**

Is BHFC or any BHFC affiliate certified to provide any interexchange telecommunications services in South Dakota? If so, please produce a copy of any responsive certification.

REQUESTS FOR PRODUCTION**Request for Production 1:**

Produce all projections of Percent of Interstate Use BHFC has provided to Qwest in connection with section 2.3.10 of Qwest's South Dakota access service tariff from January 1, 2000 to the present.

Request for Production 2:

Produce all workpapers and supporting materials prepared by BHFC in connection with projections of Percent of Interstate Use BHFC has provided to Qwest in connection with section 2.3.10 of Qwest's South Dakota access service tariff from January 1, 2000 to the present.


Request for Production 3:

Produce all projections of Percent Other Message Factor BHFC has provided to Qwest in connection with section 2.3.10 of Qwest's South Dakota access service tariff from January 1, 2000 to the present.

Request for Production 4:

Produce all workpapers and supporting materials prepared by BHFC in connection with projections of Percent Other Message Factor BHFC has provided to Qwest in connection with section 2.3.10 of Qwest's South Dakota access service tariff from January 1, 2000 to the present.

Dated: February 25, 2004



Thomas J. Welk
BOYCE, GREENFIELD, PASHBY & WELK, L.L.P.
P.O. Box 5015
Sioux Falls, SD 57117-5015
Telephone: (605) 336-2424

Tim Goodwin, Senior Attorney
QWEST SERVICES CORPORATION
1801 California Street 47th floor
Denver, CO 80202

ATTORNEYS FOR QWEST CORPORATION


CERTIFICATE OF SERVICE

I, Thomas J. Welk, certify that I am a member of the law firm of Boyce, Greenfield, Pashby & Welk, L.L.P., and on February 25, 2004, at approximately 11:45 a.m. true and correct copies of Qwest's Combined Requests for Admissions, Interrogatories and Request for Production (Third Set) were personally served via facsimile on the following :

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P.O. Box 1400
Rapid City, SD 57709

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