# **EXHIBIT 2**

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

IN THE MATTER OF SPRINT ) COMMUNICATIONS COMPANY L.P.'S ) PETITION FOR CONSOLIDATED ) ARBITRATION PURSUANT TO SECTION ) 252(B) OF THE COMMUNICATIONS ACT OF ) 1934, AS AMENDED BY THE ) TELECOMMUNICATIONS ACT OF 1996, AND ) Docket No. TC06-176 THE APPLICABLE STATE LAWS FOR ) RATES, TERMS AND CONDITIONS OF ) INTERCONNECTION WITH CITY OF ) BROOKINGS UTILITIES D/B/A SWIFTEL ) COMMUNICATIONS )

### SPRINT'S RESPONSE TO SWIFTEL'S MOTION TO COMPEL

Sprint Communications Company L.P. ("Sprint") hereby submits its Response to Swiftel's Motion to Compel in the above-referenced Docket.

On December 22, 2006, Swiftel served Sprint with its discovery in this arbitration proceeding. Sprint timely responded to the data requests, subject to and without waiving the objections Sprint raised in its responses. On January 9, 2007, Swiftel filed its Motion to Compel Discovery (the "Motion to Compel").

Sprint properly objected to several requests. Notwithstanding, Sprint is providing additional information as part of this response. By providing this additional information, however, Sprint does not waive its original objections or waive its right to contest the admissibility of the information should Swiftel attempt to offer any of it into evidence in this proceeding. These confidentiality requirements obligate companies to object to providing information that contains trade secrets and confidential information of entities that are not parties to proceedings, such as this arbitration.

## DISCOVERY DEMANDS

### **Discovery Request 4**

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Swiftel requests Sprint to identify any contracts and billing agreements that Sprint has entered into with any "third party customers." Sprint properly objected to this request and further responded that it has an agreement with MCC. Sprint did not understand the question to require the exact title of the agreement which it appears Swiftel is now requesting. Thus, in a good faith attempt to resolve this dispute, Sprint responds that the agreement Sprint identified in response to this request is: MCC TELEPHONY, INC. SPRINT COMMUNICATIONS COMPANY, L.P. LETTER OF INTENT

#### Discovery Request 5

Swiftel requests Sprint to identify any residential or business entities other than "third party customers" to whom you will provide service. Sprint renews its objection that the term "services" is vague. In its Motion, Swiftel explains that it did not intend the question to be limited to cable companies. In an attempt to resolve this issue, Sprint further responds that it will provide its services in connection with MCC initially to residential customers in Swiftel's territory. Sprint has already begun to provide its services in connection with MCC to residential customers in Qwest's territory. In addition, Sprint provides long distance service to residential and business consumers in South Dakota.

### Discovery Requests 13, 14 and 15

In the requests, Swiftel asks Sprint to:

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