
BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA

IN THE MATTER OF THE PETITION
OF SPRINT COMMUNICATIONS
COMPANY L.P. FOR ARBITRATION
PURSUANT TO THE
TELECOMMUNICATIONS ACT OF
1996 TO RESOLVE ISSUES RELATING
TO AN INTERCONNECTION
AGREEMENT WITH BROOKINGS
MUNICIPAL UTILITIES D/B/A
SWIFTEL COMMUNICATIONS

Docket No. TC06-176

**MOTION TO COMPEL RESPONSES AND PRODUCTION OF
DOCUMENTS ADDRESSED TO SPRINT COMMUNICATIONS, L.P. AS
PROPOUNDED BY BROOKINGS MUNICIPAL UTILITIES D/B/A
SWIFTEL COMMUNICATIONS**

Brookings Municipal Utilities d/b/a Swiftel Communications (Swiftel) by its attorneys, hereby moves for an order, pursuant to SDCL 15-6-37(a), compelling Sprint Communications Company L.P. (Sprint) to provide substantive, non-evasive responses to discovery requests 4, 5, 13, 14, 15, 18, 20, 23, 24, 25 and 26 and to produce the documents requested in Requests for Production of Documents 1, 3, 4, 5 and 6 contained in the Discovery Requests of Brookings Municipal Utilities d/b/a Swiftel Communications to Sprint dated December 8, 2006. Because the information sought in these discovery requests and requests for production of documents is relevant and discoverable, Sprint's objections should be overruled and Sprint should be directed to provide meaningful answers and to produce documents responsive to the subject discovery and document requests.

In addition, Swiftel asks the Commission to compel Sprint to provide its answers under oath. SDCL Section 15-6-33(a) states that:

Each interrogatory shall be answered separately and fully in writing under oath, unless it is objected to, in which event the objecting party shall state the reasons for the objection and shall answer to the extent the interrogatory is not objectionable.

Although Sprint provided a verification in connection with its responses (a copy of which is attached hereto), the verification was not signed under oath and, therefore, Sprint is not in compliance with this requirement.

Swiftel's specific arguments in connection with each discovery request and document production request are detailed below. The discovery request and document production request, along with Sprint's objections and response, are provided before Swiftel's argument in connection with each such objection and response.

DISCOVERY REQUEST (DR) 4

4. Identify any contracts and billing agreements that you have entered into with any "third party customers."

Objection: Sprint objects to this request on the grounds that it purports to seek trade secret, proprietary and highly sensitive commercial and competitive information related to Sprint's contractual arrangements with any party. Sprint further objects on the grounds that the question is vague and ambiguous, overly broad and unduly burdensome, and the information requested is not likely to lead to the discovery of admissible evidence in that the contractual relationship between Sprint and third party is not relevant to the interconnection and compensation arrangements between Sprint and Swiftel.

Response: Subject to and without waiver of the foregoing objection, Sprint responds as follows: For the state of South Dakota, MCC.

ARGUMENT

Sprint objects to identifying any contracts and billing agreements that it has entered into with any “third party customers” on a variety of grounds all of which are without merit. Further, Sprint’s response to this question is not responsive.

As to its objections, Sprint was asked only to identify the contracts and billing agreements, which would not reveal any trade secret, or proprietary or competitive information. Sprint identified only one “third party customer” to which it refers in the agreement as MCC and, therefore, this request should not be burdensome. Further, Sprint states that it is providing service jointly with MCC and, therefore, any agreements it has with MCC are relevant to this proceeding.

As to its response, Sprint was asked to identify the contracts and billing agreements it has entered into with “third party customers.” Sprint’s response identifying the “third party customer” is not responsive to the question.

DR 5

5. Identify any residential or business entities other than “third party customers” to whom you will provide service.

Objection: Sprint objects to this Request on the grounds that it is vague and ambiguous in that the term “service” is not defined.

Response: Subject to and without waiving the foregoing objection, Sprint understands the term service to refer to Sprint’s service to cable companies. Based on this

understanding, Sprint responds none at this time. See also Sprint's response to Request 17 below.

ARGUMENT

Sprint's response is not responsive to the question. Sprint limits its response to identifying only cable companies to whom it will provide service. The question, however, clearly applies to any residential or business entity other than "third party customers," which Sprint previously identified as MCC. The question is not limited to cable companies other than MCC. Sprint should be required to identify whether it will provide service to any residential or business entities including but not limited to cable companies. If Sprint will not provide service to any residential or business entities other than cable companies, it should so state.

DRs 13, 14 and 15

13. List the retail telecommunications services that you intend to provide to end users of MCC or other telecommunications carriers or service providers. State the rate that you intend to assess for each service listed,

Objection: Sprint objects to the request for "the rate" to the extent it requests Sprint to reveal the rates it charges MCC on the grounds that it purports to seek trade secret, proprietary and highly sensitive commercial and competitive information related to Sprint's contractual arrangements with MCC. Sprint further objects on the grounds that the information requested is not likely to lead to the discovery of admissible evidence in that the contractual relationship between Sprint and a third party is not relevant to the interconnection and compensation arrangements between Sprint and Swiftel.

Response: Subject to and without waiving the foregoing objection, Sprint responds as follows: Sprint provides the following functions.

- telephone exchange service (otherwise known as local telephone service)
- interexchange service (otherwise known as long distance telephone service)
- exchange access service
- public switched telephone network (PSTN) interconnection
- telephone number assignment and porting
- operator services, directory assistance and directory assistance call completion
- routing and termination of 911 calls
- intercarrier compensation functions, including reciprocal compensation for the termination of local calls if the parties do not agree to a bill and keep arrangement

47 U.S.C. § 153(46) defines telecommunications service as “the offering of telecommunications for a fee directly to the public, or to such classes of users as to be effectively available directly to the public, regardless of the facilities used.” 47 U.S.C. 153(43) defines telecommunications as “the transmission, between or among points specified by the user, of information of the user’s choosing, without change in the form or content of the information as sent and received.” The services being provided by Sprint are certainly routed between or among points specified by the user based on the fact that the users of the service are assigned numbers based on the North American Numbering Plan and call numbers based on the North American Numbering Plan. The content is unchanged in that the voice spoken on one end is the same voice heard on the other end of the call. Therefore, there is no question that “telecommunications” is being provided as defined. The distinction between telecommunications and telecommunications services is the offering of telecommunications for a fee directly or indirectly to the public. In the context of the business model being deployed by Sprint and MCC, Sprint meets both requirements.

Sprint provides the functions identified above indirectly to the public through MCC. Given that these functions are performed by Sprint's network, Sprint also provides the functions directly even though the retail relationship is between MCC and the subscribers. In effect, Sprint and MCC jointly provide services to end users in the name of MCC.

14. List the wholesale telecommunications services that you intend to provide to telecommunications carriers or service providers. State the rate that you intend to assess for each service listed.

Objection: Sprint objects to the request for rates on the grounds that it purports to seek trade secret, proprietary and highly sensitive commercial and competitive information related to Sprint's contractual arrangements with entities other than MCC Telephony, Inc. Sprint further objects on the grounds that the information requested is not likely to lead to the discovery of admissible evidence in that the contractual relationship between Sprint and third party is not relevant to the interconnection and compensation arrangements between Sprint and Swiftel.

Response: Subject to and without waiver of the foregoing objection, Sprint responds as follows: see Sprint's response to Discovery Request 13.

15. List the wholesale telecommunications services that you intend to provide to MCC. State the rate that you intend to assess for each service listed.

Objection: Sprint objects to this request as being irrelevant and not calculated to the lead to the discovery of admissible evidence in that the contractual relationship

between Sprint and MCC is not relevant to the interconnection and compensation arrangements between Sprint and Swiftel.

Response: Subject to and without waiver of the foregoing objection, Sprint responds as follows: see Sprint's response to Discovery Request 13.

ARGUMENT

Discovery Requests 13, 14 and 15 ask Sprint to 1) list the retail telecommunications services that Sprint intends to provide to end users or MCC or other telecommunications carriers or services providers (DR13); 2) list the wholesale telecommunications services that Sprint intends to provide to telecommunications carriers or services providers (DR 14); and 3) list the wholesale telecommunications services that Sprint intends to provide to MCC (DR 15) and 4) state the rate that Sprint intends to assess for each service listed. Sprint attempts to evade the questions by providing a combined response and stating that the same response applies to each question. Thus, Sprint has refused to distinguish the services that it will provide as either retail or wholesale services and as either services provided to end users or to telecommunications carriers.

These questions are relevant to this proceeding because Sprint has represented that it is a telecommunications carrier entitled to certain benefits of Section 251(b) of the Act, including reciprocal compensation for the transport and termination of local calls. The responses to the questions will provide evidence as to whether Sprint is a telecommunications carrier with respect to the services it will provide in connection with its relationship with MCC and this agreement. The responses also are relevant to determine whether Sprint will terminate local calls.

These questions also are relevant to determine the meaning of Sprint's representations at pages 12 through 14 of its Petition concerning its relationship with MCC and the provision of various services.

DRs 18 and 20

18. At page 18 of the Arbitration Petition, you state that "Sprint will provide industry standard call records that can be used for billing purposes. Sprint also agrees to provide the necessary records for audit purposes to ensure accurate billing." Identify all information that would be provided by Sprint as part of "industry standard call records." Identify all records that would be provided by Sprint as "necessary records for audit purposes." State how wireline and wireless traffic will be identified in the records. State the format (paper or electronic) that the data will be provided.

Response: Sprint offers terminating LECs two options. The LEC can electronically capture data originated by Sprint's SS7 information that can be captured in the LEC's Automated Message Accounting (AMA) records to render a bill using Exchange Message Record (the industry standard) or the LEC can use billing factors provided by Sprint (on paper) to render a bill.

20. At page 19 of the Arbitration Petition, you state that "Sprint will provide industry standard call records that can be used for billing purposes or the development of factors (percent interstate usage ("PIU") and percent local usage ("PLU")). Sprint also agrees to provide the necessary records for audit purposes to ensure accurate billing." Identify all information that would be provided by Sprint as part of "industry standard call records". Identify all that would be provided by Sprint as "necessary records for audit

purposes.” State how traffic subject to interstate access charges will be distinguished from traffic subject to intrastate access charges in the records and the format (paper or electronic) that the data will be provided.

Response: See response to Request 18 above.

ARGUMENT

In its response to DR 18 and 20, Sprint does not identify the information that would be provided by Sprint as part of the call records to which it refers in its Petition at pages 18 and 19. While Sprint indicates that it will provide SS7 information, there are many fields of data that may be contained in an SS7 message. Carriers, however, do not always populate all of the SS7 fields. Sprint’s responses, therefore, are not responsive to the questions because Sprint does not identify the information that it will provide. Sprint also does not identify the records that it would provide for audit purposes or state how wireline and wireless traffic will be identified and how traffic subject to interstate access charges will be distinguished from traffic subject to intrastate access charges. This information is necessary to determine the veracity of Sprint’s statements at pages 18 and 19 of its Petition that the call records to be provided by Sprint “can be used for billing purposes” and that they will be sufficient “for audit purposes to ensure accurate billing.”

DRs 23, 24, 25 and 26

23. For all equipment installed or required to be installed to deliver services to MCC or MCC’s end users in the Brookings service territory, including but not limited to switching equipment (Stored Program Control Class S and Class 4 switches including remote switches for these switches, Next Generation / Soft Switches including all

services or ancillary gateways, IP PBXs analog PBXs), data routers / switches, and transport equipment (ATM, SONET, MPLS, Frame Relay, IP, and wave division multiplexing) provide a list of manufacturer and model numbers for each piece of equipment. Provide the technical manuals for each piece of equipment identified.

Objection: Sprint objects to this request as it is unduly burdensome. Sprint further objects as this request is irrelevant because it is not calculated to lead to the discovery of admissible evidence that is relevant to the arrangements between Sprint and Swiftel under the proposed interconnection agreement. The equipment utilized by Sprint to deliver its services to MCC and MCC's end-users is not relevant to the interconnection issues in the arbitration between Sprint and Swiftel.

24. Provide a list of all equipment and facilities in South Dakota which are owned, leased or controlled by Sprint, which are available for use to deliver traffic exchanged under the Agreement.

Objection: Sprint objects to this request because it is not calculated to lead to the discovery of admissible evidence that is relevant to the arrangements between Sprint and Swiftel under the proposed interconnection agreement.

Response: Subject to and without waiver of the foregoing objection, a facility of the required capacity will be provisioned at Sprint's POP which is located at 1000 North Cliff Avenue, Sioux Falls, SD 57103.

25. Provide a list of all equipment and facilities in South Dakota which Sprint intends to use to deliver traffic exchanged under the Agreement to MCC or to receive traffic exchanged under the Agreement from MCC. Provide a list of all equipment and

facilities in South Dakota which will be used to deliver traffic exchanged under the Agreement to end users of MCC or to receive traffic exchanged under the Agreement from end users of MCC.

Objection: Sprint objects to this request as it is unduly burdensome. Sprint further objects as this request is irrelevant because it is not calculated to lead to the discovery of admissible evidence that is relevant to the arrangements between Sprint and Swiftel under the proposed interconnection agreement.

26. Provide a list of the locations by street address of all equipment and facilities identified in Question 24 and 25. These locations shall include but not be limited to locations of buildings, huts, collocation sites, and electronic equipment cabinets both pad and pole mounted.

Objection: Sprint objects to this request as it is unduly burdensome. Sprint further objects as this request is irrelevant because it is not calculated to lead to the discovery of admissible evidence that is relevant to the arrangements between Sprint and Swiftel under the proposed interconnection agreement.

Response: Subject to and without waiver of the foregoing objection, See Sprint's response to 24.

ARGUMENT

Sprint objects to Swiftel's requests for a list of manufacturer and model numbers for equipment installed or required to be installed to deliver services to MCC or MCC's end users, including but not limited to switching equipment (DR 23); a list of all equipment and facilities owned or leased by Sprint which are available for use to deliver

traffic exchanged under the Agreement (DR 24); a list of all equipment and facilities which Sprint intends to use to deliver traffic exchanged under the Agreement or to receive traffic exchange under the Agreement (DR 25); and a list of the locations of all equipment and facilities identified in Questions 24 and 25 (DR 26). Sprint objects to these requests on the grounds that they are burdensome and irrelevant.

These questions are relevant to this proceeding because Sprint has represented that it is a telecommunications carrier entitled to certain benefits of Section 251(b) of the Act, including reciprocal compensation for the transport and termination of local calls. The responses to the questions will provide evidence as to whether Sprint will terminate local calls.

These questions also are relevant to determine the meaning of Sprint's representations at pages 12 through 14 of its Petition concerning its relationship with MCC and the provision of various services.

PRODUCTION OF DOCUMENT REQUEST (PDR) 1

1. Produce all documents that were:
 - a. Referenced by you in responding to any interrogatory;
 - b. Identified in any interrogatory response;
 - c. Relevant to any interrogatory response; or
 - d. That you contend support your responses to the interrogatories propounded herein.

Objection: Sprint objects to this request as unduly broad, burdensome, vague and would cause Sprint to incur undue expenses. A blanket request for all documents of any type or kind that relate to any responses to the foregoing Interrogatories would potentially involve millions of pages of documents and is overbroad and burdensome.

Response: Subject to and without waiving any objections, Sprint responds as follows:

See Attachment 1 and POD 8.

ARGUMENT

Sprint provides two documents in response to this question but does not indicate as requested whether the documents are provided in response to subpart a., b., c. or d. of the question. Sprint's response, therefore, is not complete. Further, because Sprint refused to identify any of the documents for which identification was requested in the Discovery Requests, Sprint's position that the production of such documents would be voluminous is unsupported.

PDR 3

3. Provide a diagram of the facilities identified in Question 24 and 25.

Objection: Sprint objects to this request as it is unduly burdensome. Sprint further objects as this request is irrelevant because it is not calculated to lead to the discovery of admissible evidence that is relevant to the arrangements between Sprint and Swiftel under the proposed interconnection agreement.

ARGUMENT

Sprint objects to providing a diagram of the facilities identified in Question 24 and 25 as unduly burdensome and not relevant. This information is relevant to this proceeding because Sprint has represented that it is a telecommunications carrier entitled to certain benefits of Section 251(b) of the Act, including reciprocal compensation for the transport and termination of local calls. The information requested will provide evidence as to whether Sprint will terminate local calls. In addition, Sprint has made representations concerning the services it will provide and the services MCC will provide. The information requested in this PDR will provide evidence concerning Sprint's representations.

PDR 4

4. Provide a copy of the contract and other documents, including addendums and amendments, which establish and govern the operations and business relationship between Sprint and MCC for the provision of CLEC service in the Brookings exchange territory.

Objection: Sprint objects to this request on the grounds that it purports to seek trade secret, proprietary and highly sensitive commercial and competitive information related to Sprint's contractual arrangements with MCC. To the extent the request asks for agreements for the provision of CLEC services, Sprint further objects to this request as the information requested is not likely to lead to the discovery of admissible evidence in that the contractual relationships between Sprint and other entities are not relevant to the interconnection and other issues present in the arbitration between Sprint and Swiftel.

ARGUMENT

Sprint objects to providing a copy of the contract or other documents which establish and govern the operations and business relationship between Sprint and MCC on the grounds that it seeks trade secret, proprietary and sensitive commercial and competitive information and that the information is not likely to lead to the discovery of admissible evidence. This information is relevant to this proceeding because Sprint has represented that it is a telecommunications carrier entitled to certain benefits of Section 251(b) of the Act, including reciprocal compensation for the transport and termination of local calls. The information requested will provide evidence as to whether Sprint will terminate local calls. In addition, Sprint has made representations concerning the services it will provide and the services MCC will provide. The information requested in this PDR will provide evidence concerning Sprint's representations. As for Sprint's claims concerning trade secret, proprietary and sensitive commercial and competitive information, Swiftel is bound by the Protective Order issued by the Commission in this proceeding.

PDR 5

5. Provide an actual fully populated call record sample (AMA CDR) for each and every call type Sprint is proposing to transport over the multi-jurisdictional, multi-use trunk you are describing in this petition.

Response: Sprint does not have actual fully populated call record samples to provide at this time. Sprint has only recently obtained the right to transport multi-use and multi- jurisdictional traffic over the same trunk group. Moreover, Sprint would be

prohibited from providing such records if they existed with other carriers which contain customer or carrier proprietary information. See 47 U.S.C. § 222.

ARGUMENT

Sprint states that it would be prohibited from providing a fully populated call record sample which contains customer or carrier proprietary information. This information is necessary to evaluate Sprint's contentions at pages 18 and 19 of its Petition that Sprint will provide information sufficient for Swiftel to appropriately bill for its services. Although Sprint has not identified the specific information that it claims would be considered proprietary, Swiftel believes that any such information could be redacted to prevent specific customer or carrier identification while still providing a sufficiently complete record for the purposes requested. For example, the last four digits of called telephone numbers and the last four digits of the originating telephone numbers could be redacted to protect the identity of customers.

PDR 6

6. Provide all agreements between Sprint including its affiliates and MCC including its affiliates that are required to implement the delivery of services as outlined in its Petition requesting arbitration.

Objection: Sprint objects to this request on the grounds that it purports to seek trade secret, proprietary and highly sensitive commercial and competitive information related to Sprint's contractual arrangements with MCC. Sprint further objects to this request as the information requested is not likely to lead to the discovery of admissible evidence in that the contractual relationships between Sprint and other entities are not

relevant to the interconnection and other issues present in the arbitration between Sprint and Swiftel.

ARGUMENT

Sprint objects to providing all agreements between Sprint and MCC that are required to implement the delivery of services as outlined in its Petition on the grounds that it seeks trade secret, proprietary and sensitive commercial and competitive information and that the information is not likely to lead to the discovery of admissible evidence. This information is relevant to this proceeding because Sprint has represented that it is a telecommunications carrier entitled to certain benefits of Section 251(b) of the Act, including reciprocal compensation for the transport and termination of local calls. The information requested will provide evidence as to whether Sprint will terminate local calls. In addition, Sprint has made representations concerning the services it will provide and the services MCC will provide. The information requested in this PDR will provide evidence concerning Sprint's representations. As for Sprint's claims concerning trade secret, proprietary and sensitive commercial and competitive information, Swiftel is bound by the Protective Order issued by the Commission in this proceeding.

PDR 8

8. Provide network diagram(s) detailing how the Sprint/MCC network will process all call types for its subscribers, including but not limited to local, 8XX, 9XX, Extended Area Service (EAS), intrastate access, interstate access, international access, wireless within the Minneapolis MTA, wireless outside the Minneapolis MTA, inter-machine trunk, operator service, directory assistance, 911, and other XII.

Objection: Sprint objects to this request as the information requested is not likely to lead to the discovery of admissible evidence in that the contractual relationships between Sprint and other entities are not relevant to the interconnection and other issues present in the arbitration between Sprint and Swiftel.

Response: Subject to and without waiver of the foregoing objection, Sprint responds as follows: all call types are depicted on Sprint Attachment POD 8, which consists of a diagram regarding how Sprint plans to interconnect with MCC. Please note the diagram is not an exhaustive response, but rather is intended to provide a representative example.

ARGUMENT

Sprint objects to providing a network diagram detailing how the Sprint/MCC network will process all call types for its subscribers on the grounds that the information is not relevant. This information is relevant to this proceeding because Sprint has represented that it is a telecommunications carrier entitled to certain benefits of Section 251(b) of the Act, including reciprocal compensation for the transport and termination of local calls. The information requested will provide evidence as to whether Sprint will terminate local calls. In addition, Sprint has made representations concerning the services it will provide and the services MCC will provide. The information requested in this PDR will provide evidence concerning Sprint's representations.

With respect to Sprint's response, Sprint admits that its response is not complete. In addition, Sprint's diagram does not detail how the Sprint/MCC network will process call types. Call processing is commonly understood in the industry to mean the sequence of operations performed by a switching system from the acceptance of an incoming call

through the final disposition of the call or the end-to-end sequence of operations performed by a network from the instant a call attempt is initiated until the instant the call release is completed. Accordingly, Sprint should be required to fully provide the information requested.

CONCLUSION

For all of the above reasons, Swiftel requests that the Commission direct Sprint to provide complete, non-evasive substantive responses to discovery requests 4, 5, 13, 14, 15, 18, 20, 23, 24, 25 and 26 and to produce the documents requested in Requests for Production of Documents 1, 3, 4, 5 and 6 contained in the Discovery Requests of Brookings Municipal Utilities d/b/a Swiftel Communications to Sprint dated December 8, 2006. Swiftel also asks the Commission to compel Sprint to provide its answers under oath as required by SDCL Section 15-6-33(a).

Respectfully submitted,

**BROOKINGS MUNICIPAL UTILITIES
D/B/A/ SWIFTEL COMMUNICATIONS**

By: /s/ Mary J. Sisak

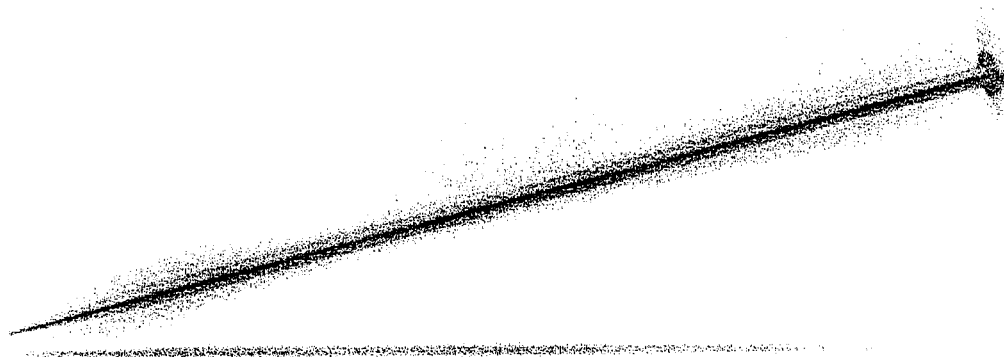
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ITS ATTORNEYS

January 9, 2007

Sprint for Cable Operators



Capturing more business with
exceptional voice telephony services



One Sprint. Many Solutions.™

The Provider of Choice for Voice Telephony Services

As a cable operator, you know what it takes to thrive in an increasingly competitive marketplace:
the clear sound of a human voice.

Today's consumers want the value and convenience of obtaining home voice, wireless communications, high-speed data and video from a single provider with a single price and a single monthly bill. Voice telephony services offer cable operators a highly attractive opportunity to overcome new competition, capture new revenues and build a customer base for new services such as enhanced video and online gaming. Yet delivering voice services requires significant new investments in network infrastructure, management resources for complex technical and regulatory issues, and employee training.

To address these issues, many cable operators are choosing a telecommunications provider, enabling a cable operator to leverage the provider's existing networks, management experience and technical knowledge. For many cable operators, the provider of choice will be Sprint to deliver integrated local and long-distance home voice, wireless and data services.

With Sprint you can benefit from the reliability and expertise of an industry leader in deploying local voice services. Look to Sprint for a world-class network and home and wireless voice and data services with nationwide coverage. Sprint can fulfill your telecommunications needs, from basic transport to a fully outsourced solution that encompasses network design, implementation and management. And as a vendor of strength and stability, Sprint backs its solutions with service level agreements (SLAs) and comprehensive support from experienced professionals.

By choosing Sprint as your telecommunications provider, you can:

- ▶ Offer sophisticated, high-value solutions to your customers based on exceptional voice, wireless and data services from Sprint
- ▶ Free capital and focus on growing your business by letting Sprint handle network transport and management
- ▶ Go to market quickly and scale your offerings easily with rapid service deployment and per-subscriber pricing
- ▶ Strengthen your competitive position by leveraging the Sprint 100% digital, fiber-optic network that can deliver unsurpassed reliability and “pin-drop” quality
- ▶ Sustain the very high service levels your customers expect with the backing of Sprint service level agreements (SLAs) and award-winning technical support



Sprint Solutions Tailored for Cable Operators

Voice Transport and Telephony Solutions

Offering voice telephony service may seem to be as simple as providing dial tone. In fact, it requires a complex mix of equipment, network links and functionality. From calling features and voice mail ... toll-free numbers and calling cards ... to operators, relay systems and 911 calls ... not to mention regulatory matters, inter-connection agreements and revenue settlements ... voice services represent a whole new realm of infrastructure, resources and expertise for most cable operators.

You'll find Sprint to be an outstanding provider for voice transport and telephony solutions. Acting as a service bureau, Sprint offers a full range of services necessary to operate as a competitive local-exchange carrier (CLEC). Sprint can tailor a solution to meet your distinctive needs with

superior voice products, equipment, network connectivity and CLEC administrative services. Network design, implementation and management services can give you the benefits of Sprint expertise while enabling you to focus internal staff and resources on core network issues.

Sprint can deploy, operate and monitor all necessary network elements, which minimizes your capital investment and operating risk. Sprint will partner with your company at any level — from delivering select components to a full, turnkey solution.

Wireless Solutions

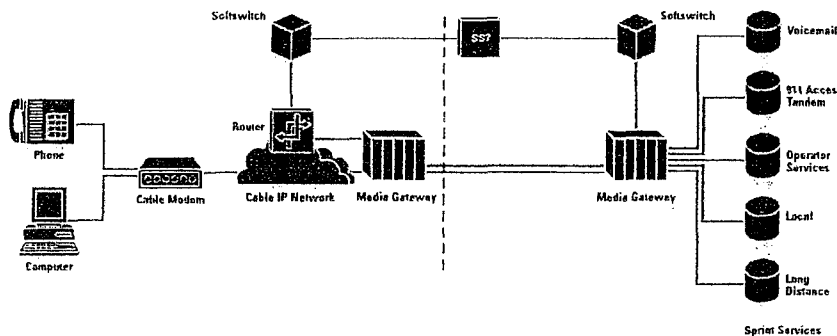
By adding wireless to your services suite you can offer a complete voice solution that has high appeal to new and existing customers.

Sprint wireless voice and data services are carried over a 100% digital, nationwide network that offers advanced wireless coverage for outstanding service availability. Unlike some carriers, Sprint wireless and wireline services work together — giving you the simplicity of working with a single provider.

Data Solutions

For delivering Internet access and business data services, Sprint offers a broad portfolio of innovative data solutions, carried on the Sprint Tier 1 IP backbone. To enhance your competitive advantage, Sprint backs its data products with industry-leading SLAs for timely installation, end-to-end service availability and quick-turnaround repair service.

VoIP Network Design



Network Design and Implementation Services

Building a new telephony network is a time-consuming and costly effort. And it's important to get the network design right, in order to assure stability and scalability. Sprint provides a complete portfolio of network design and implementation services, delivered by Sprint professionals with recognized technical experience and insight.

Network Management Services

Round-the-clock network monitoring and management are essential to assure the ultra-high reliability your customers require for voice telephony.

By outsourcing network management to Sprint, your voice services are under the watchful eyes of some of the best networking professionals in the business. In fact, Sprint was cited as the top-rated telecommunications company in *InformationWeek's* "Analyzing the Outsourcers" study.

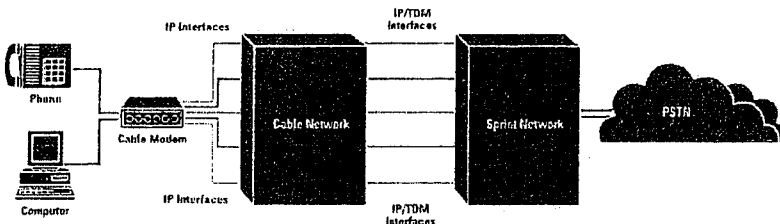
All Sprint links and services in your network are monitored 24x7 from a Sprint network operations center — enabling fast, effective response to problems. And by outsourcing network management to Sprint, you sidestep the expense and learning curve associated with managing new technologies, network designs and maintenance tasks.

Support for Diverse Cable System Architectures

Sprint voice and data services are based on a converged, highly reliable and fault-tolerant network platform that is adaptable to support many cable system architectures. What's more, the Sprint network is designed to telecommunications industry standards that provide interoperability with solutions based upon CableLabs DOCSIS, PacketCable and other evolving cable industry standards. This essential interoperability allows you to maximize existing cable network resources and capital investments while rapidly deploying voice services.

Sprint voice services operate on a voice over Internet protocol (VoIP) network and are compatible with a cable operator's VoIP deployment as well as circuit-switched, time division multiplexing (TDM) implementations. Sprint offers network solutions that can enable you to choose the optimal network interface and services while supporting future migration to new technologies.

Cable Architecture



Turn to Sprint for a comprehensive portfolio of voice services, available individually or as a complete package.

CLEC Service Bureau Services

- ▶ One-number services
- ▶ 800 and CLEA services
- ▶ Call forwarding
- ▶ Voice mail
- ▶ Carrier selection (dial tone)
- ▶ Caller ID and other calling features
- ▶ Teleconference services
- ▶ 900 and 976 calls
- ▶ Domestic and international long distance
- ▶ Queue verification
- ▶ Number administration
- ▶ Call routing
- ▶ Directory assistance, features and distribution
- ▶ Caller PIC verification
- ▶ Local number portability
- ▶ Hierarchical compensation
- ▶ Billing record creation
- ▶ Call detail record management
- ▶ Access billing
- ▶ Toll-free number services
- ▶ Billing and

Network Design and Implementation Services

- ▶ IP Core services and equipment
- ▶ VoIP to PSTN network interconnection
- ▶ VoIP transport
- ▶ Circuit emulation
- ▶ Redundant routing and service
- ▶ QoS prioritization

Network Management and Support Services

- ▶ Network monitoring
- ▶ Alarm monitoring and resolution
- ▶ 24x7 customer and technical support
- ▶ Service problem resolution system
- ▶ Network configuration management
- ▶ Network performance and optimization
- ▶ Network operational support program
- ▶ Regulatory reporting
- ▶ Network capacity planning

Sprint: One Company to Count On

Solid experience and staying power. Choosing a carrier to entrust with your customers' essential voice services may be one of the most important business decisions you'll ever make. You want a carrier of strength and stability with a world-class network and product portfolio, long experience and proven expertise. With more than 100 years of local telecommunications experience and a reputation as an industry leader, Sprint is a company to count on.

Comprehensive solutions. Whether for voice or data, wireline or wireless, Sprint can connect your customers nationwide with exceptional quality and reliability. The comprehensive portfolio of Sprint solutions can make it easier for you to offer the service bundles that subscribers want.

Acclaimed quality and reliability. Quality of service is a critical differentiator for voice applications. The Sprint network is engineered to deliver the extraordinary service quality your customers will demand. Sprint's long distance network had the fewest FCC-reportable outages of the top three major competitors for the seventh straight year.

Innovation. With a network that is already 100% digital and IP-based, Sprint can quickly adopt new technologies. This innovation can give you an edge for offering new solutions that integrate home and wireless voice with data and video.

Capture More Business with Sprint

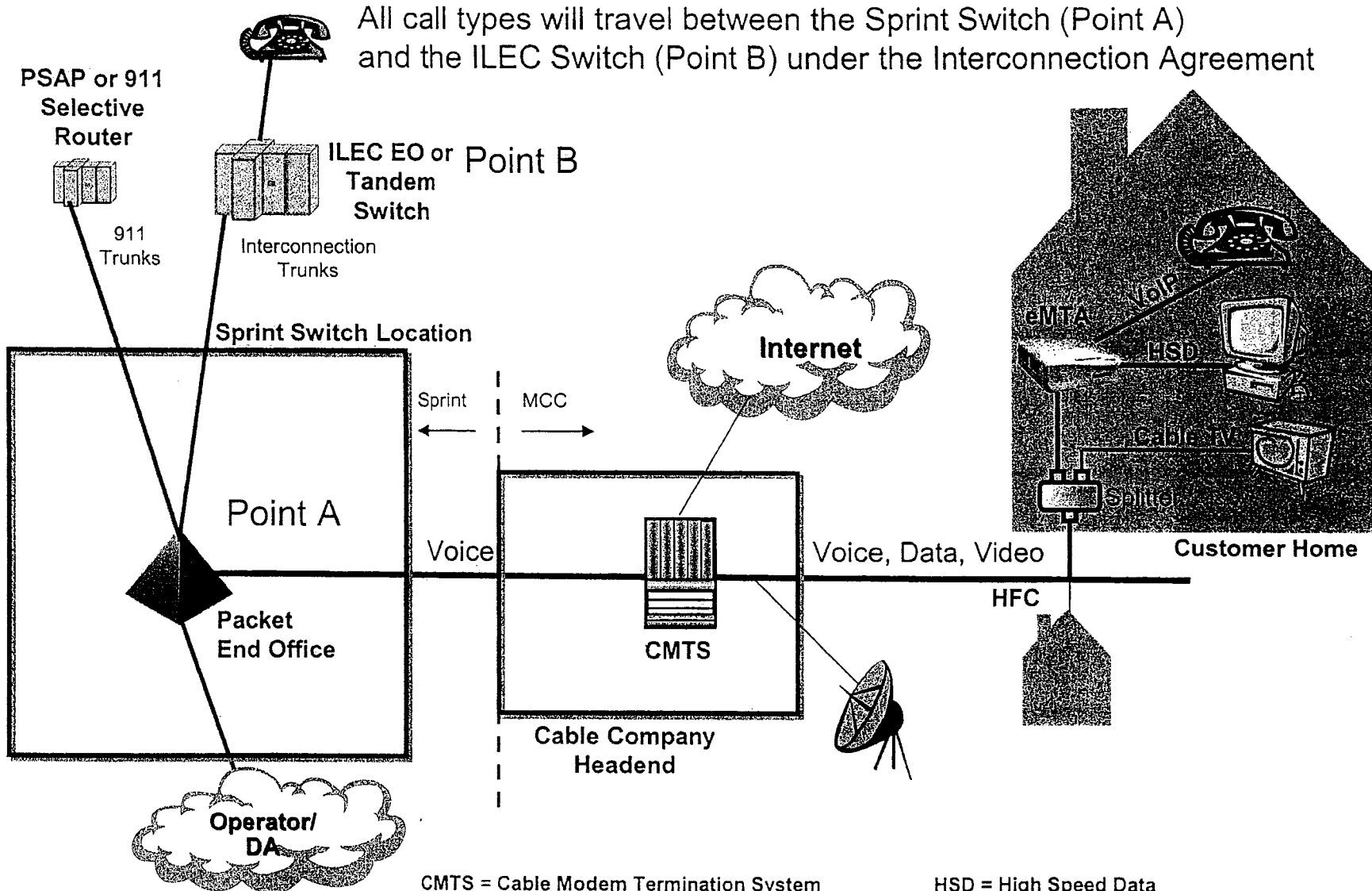
Whether you need basic transport services or advanced voice solutions, count on Sprint for a technology strategy, an advanced network, extensive product choices and exceptional customer support. Let a Sprint account team show you the Sprint products and services that help cable operators capture more business and offer new solutions to subscribers.

For more information about Sprint solutions for the cable industry, call 1 877 801-4283 or visit sprint.com/business.



One Sprint. Many Solutions.™

Sprint Attachment POD 8



CMTS = Cable Modem Termination System
 eMTA = Embedded Multimedia Terminal Adaptor

HSD = High Speed Data
 HFC = Hybrid Fiber Coax

VERIFICATION

That the undersigned Director - Policy for Sprint Nextel Corporation has read **SPRINT COMMUNICATIONS COMPANY L.P.'s RESPONSE TO BROOKINGS MUNICIPAL UTILITIES D/B/A SWIFTEL COMMUNICATIONS FIRST SET OF DISCOVERY REQUESTS AND PRODUCTION OF DOCUMENTS** and knows the contents thereof and knows the same is true to his/her own knowledge, except for those matters stated therein upon information and belief, and as to those matters, believes them to be true.

BY: Jim Burt

TITLE: Director - Policy

AS TO OBJECTIONS

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 9th day of January, 2007, I served a true and correct copy of the MOTION TO COMPEL RESPONSES AND PRODUCTION OF DOCUMENTS ADDRESSED TO SPRINT COMMUNICATIONS, L.P. AS PROPOUNDED BY BROOKINGS MUNICIPAL UTILITIES D/B/A SWIFTEL COMMUNICATIONS via email and by U.S. Mail, postage prepaid, to the following:

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