

**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 TELECOMMUNI- )  
CATIONS ACT OF 1996 TO RESOLVE )  
ISSUES RELATING TO AN INTER- )  
CONNECTION AGREEMENT WITH )  
BROOKINGS MUNICIPAL UTILITIES )  
D/B/A SWIFTEL COMMUNICATIONS )**

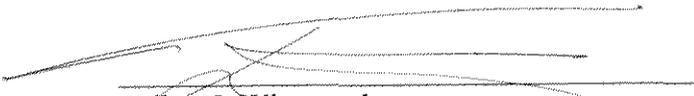
**Docket No. TC06-176**

**SPRINT COMMUNICATIONS COMPANY L.P.'S MOTION TO COMPEL**

Sprint Communications Company L.P. ("Sprint") by and through its attorneys, respectfully moves the Commission under A.R.S.D. 20:10:01:22.01, to issue an order compelling Brookings Municipal Utilities, d/b/a Swiftel Communications ("Swiftel") to produce responses to Sprint's first set of discovery requests. Specifically, Sprint requests that Swiftel be compelled to provide complete and appropriate responses to Request Nos. 2, 3, 15, 19, 26, 29, and 38. Such an order is appropriate because Swiftel failed to provide appropriate and complete responses to the aforementioned requests.

WHEREFORE, Sprint requests an order to compel be issued against Swiftel to provide complete and adequate responses to the above-referenced requests. This motion is based upon the documents and pleadings on file herein and upon the facts and authorities cited in Sprint's Memorandum in Support of Motion to Compel, attached hereto and incorporated herein by reference.

DATED this 9<sup>th</sup> day of January, 2007.



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ATTORNEYS FOR  
SPRINT COMMUNICATIONS COMPANY L.P.

## CERTIFICATE OF SERVICE

The undersigned certifies that on this 9th day of January 2007, a copy of the foregoing was served electronically and by first-class mail to:

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