
BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA

In the Matter of Sprint Communications
Company L.P.'s Petition for Authority to
Provide Local Exchange Service in
Certain Rural Areas Served by
Brookings Municipal Utilities d/b/a
Swiftel Communications

Docket No. TC06-178

Docket No. TC06-188

**MOTION TO COMPEL REDACTED PORTIONS OF THE SPRINT/MCC
AGREEMENT**

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) and MCC Telephony of the Midwest, Inc., d/b/a Mediacom (MCC) to provide certain portions of the material redacted from the agreement between Sprint and MCC and provided by them in response to Swiftel's interrogatories and the Motion to Compel hearing held on July 14, 2008 before the Commission. The agreement is comprised of the following: Letter of Intent, Summary of Principal Terms and Conditions (Exhibit A), and Appendix 1, 2, 3, 4 and 5. Swiftel's specific arguments in connection with the redacted portions of the agreement that it seeks are detailed in the confidential attachment to this Motion entitled "Identification of Redacted Material Sought by Swiftel and Argument." Swiftel has filed the attachment as

confidential because the underlying agreement was provided as confidential and pursuant to a protective order. As demonstrated in the confidential attachment, the redacted material is relevant to the Sprint and MCC petitions for certification and discoverable. Accordingly, Sprint and MCC should be directed to provide the redacted material for use in each entities respective certificate of authority proceeding.

In an effort to resolve this matter without a further motion before the Commission, on July 16, 2008, Swiftel provided to Sprint and MCC the list of redacted sections sought and Swiftel's reason for seeking the material. Neither Sprint nor MCC responded substantively to Swiftel's request.

Accordingly, Swiftel requests that the Commission direct Sprint and MCC to provide the redacted provisions and sections of the agreement as specified in the attachment.

Respectfully submitted,

BROOKINGS MUNICIPAL UTILITIES
D/B/A/ SWIFTEL COMMUNICATIONS

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July 21, 2008

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 21st day of July, 2008, a copy of the **Motion to Compel Redacted Portions of the Sprint/MCC Agreement and the confidential Identification of Redacted Material Sought by Swiftel and Argument** was served via electronic mail to the following unless otherwise noted:

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