

EXHIBIT 1

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA

IN THE MATTER OF THE PETITION
OF VENTURE COMMUNICATIONS
COOPERATIVE FOR SUSPENSION
OR MODIFICATION OF LOCAL
DIALING PARITY AND RECIPROCAL
COMPENSATION OBLIGATIONS

DOCKET NO. TC06-181

ANSWERS TO
INTERROGATORIES (FIRST SET),
REQUESTS FOR ADMISSION AND
DOCUMENT REQUESTS

In accordance with the Commission, Alltel Communications, Inc. ("Alltel") hereby responds to the Interrogatories (First Set) of Venture Communications and Requests for Admissions.

ALLTEL'S RESPONSE TO FIRST SET OF INTERROGATORIES

1. Identify each person who provided information or documents for the answers to these requests for discovery.

Response: The following persons provided information or documents in support of Alltel's responses: Ron Williams, Vice President-Interconnection and Compliance, 3650 131st Avenue S.E., Suite 600, Bellevue, Washington 98006; Rhonda Thomas, Analyst-Regulatory Affairs, 3650 131st Avenue S.E., Suite 600, Bellevue, Washington 98006; and Art Witkowski, Senior Engineer-Transport Engineering, 3650 131st Avenue S.E., Suite 600, Bellevue, Washington 98006

2. Identify each person answering, or formulating answers for, these requests for discovery.

Response: Ron Williams with assistance of counsel.

3. Identify all persons known to you who have personal knowledge of any facts or documents disclosed in answers to these requests for discovery, specifying the numbered response to which each individual has knowledge.

Response: See responses to Interrogatories 1 and 2.

4. Identify each person with whom you have consulted as an expert concerning any issue in this proceeding, and whether you have received a written report from any such expert.

Response: Objection, this interrogatory requests information not subject to discovery.

5. Identify each person you intend to utilize as an expert witness in this proceeding, together with the subject matter on which the expert is expected to testify, the substance of the facts and opinions to which the expert is expected to testify, and a summary of the grounds for each opinion; and whether you have received a written report from any such expert witness. Further, provide the full professional curriculum vitae for any expert mentioned in the answers to these interrogatories.

Response: Alltel has not yet determined who it will use as an expert witness in this proceeding. Such information will be provided when a determination is made.

6. State the custodian of each written report mentioned in your answer to the preceding two interrogatories, and if you will do so without a motion to produce, attach to the answer to these interrogatories copies of such reports.

Response: Not applicable at this time.

7. Identify each witness you intend to call at the hearing on the merits of the proceeding not otherwise mentioned in your answer to these interrogatories.

Response: Alltel has not yet determined who it will call as a witness in this proceeding.

8. Identify, and produce if not otherwise produced, each document, memorandum, or other writing in your possession relevant to the subject matter of this proceeding that you intend to use as an exhibit at the hearing on the merits of this proceeding.

Response: Alltel has not yet determined what exhibits it will use at hearing and will provide such in accordance with the procedural obligations determined by the Hearing Examiner.

9. Identify any and all Affiliates of Alltel, and explain the terms and conditions on which you exchange traffic with each such Affiliate and describe the ownership structure of Alltel and each of its Affiliates.

Response: Alltel objects to this request as the information requested seeks information that is not relevant or likely to lead to the discovery of admissible evidence regarding the instant suspension proceeding.

10. For each wireless site tower or other structure owned by Alltel within the MT A, provide a detailed description for the following items:

- a. Latitude and longitude of tower or other structure
- b. Type of tower or other structure
- c. Height of tower or other structure

- d. Height and quantity of antennas used by Alltel
- e. Actual costs for the tower or other structure materials, including, but not limited to tower steel and appurtenances, plus any internal costs incurred by Alltel for miscellaneous materials and overheads
- f. Tower or other structure space leased to other entities
 - i. Height of antennas for which space is leased on the tower
 - ii. Number of antennas for which space is leased
 - iii. Monthly lease revenue for each antenna
 - iv. Monthly lease revenue for waveguide, coaxial cable or other feedline
 - v. Terms of lease including, but not limited to, effective date, number of years, monthly lease rate per antenna, monthly lease rate per lineal foot, antennas for renewal

Response: Alltel objects to the request as unduly burdensome, onerous, wholly irrelevant and not likely to lead to the discovery of admissible evidence within the instant suspension proceeding. Venture's request for specific Alltel cost information is premature. In order to grant Venture's request for suspension/modification, 47 U.S.C. 251(f)(2) requires a specific showing by Venture of the (i) the adverse economic impact of users of telecommunication services generally as a result of Venture's compliance with its **current** obligations; or (ii) the unduly burdensome economic effect of the **current** reciprocal compensation obligation. An examination of Alltel's specific costs is irrelevant to each analysis. Such information is not relevant or discoverable unless and until the suspension petition with respect to asymmetrical compensation is ultimately determined in favor of Venture and the issue is contested or analyzed within an arbitration proceeding. However, Venture has not yet been granted such relief within the current proceeding and its modification request is the subject of a Motion for Dismissal currently pending and incorporated herein by reference. Subject to, and without waving said objections, the information requested in subparts a), b), and c) is available in the FCC's ULS Database at <http://gullfoss2.fcc.gov/cgi-bin/ws.exe/genmen/index.hts>

11. For each wireless site that contains antenna space leased by Alltel within the MTA, provide a detailed description for the following items:
- a. Latitude and longitude of tower
 - b. Height of wireless access antennas and/or microwave antennas on the tower
 - c. Number of wireless access antennas and/or microwave antennas
 - d. Monthly lease expense for each wireless access antenna and/or microwave antenna
 - e. Monthly lease expense for waveguide, coaxial cable or other feedline
 - f. Terms of lease including, but not limited to, effective date, number of years, monthly lease rate per wireless access antenna and/or microwave antenna, monthly lease rate per lineal foot, terms for renewal

Response: See response to DR 10.

12. Identify the actual construction costs including, but not limited to, any contractor costs, any subcontractor costs, any internal labor costs incurred by an Alltel employee,

any material costs incurred by Alltel, and any miscellaneous overhead costs incurred by Alltel at each owned wireless site within the MTA for the following items:

- a. Dirt work, site preparation
- b. Foundations
- c. Anchor points
- d. Exterior ground system
- e. Access road
- f. Fence
- g. Landscaping
- h. Tower erection

Response: See response to DR 10. As an additional objection, the request is overly board and unduly burdensome as numerous tower sites have been acquired by Alltel in various buyouts and the information either no longer exists or would require significant costs to retrieve.

13. For each wireless site owned by Alltel within the MTA and at each wireless tower site that contains antenna space leased by Alltel within the MT A, identify the following information:

- a. Type of waveguide, coax or other feedline
- b. Diameter of the feedline
- c. Length of the feedline
- d. Number of feedline runs
- e. Total actual cost of the feedline including any internal costs incurred by Alltel for labor, materials and miscellaneous overheads

Response: See response to DR 10.

14. Identify the site acquisition costs including any internal costs incurred by Alltel for labor, materials and miscellaneous overheads at each wireless tower site owned by Alltel within the MTA, including but not limited to:

- a. Actual cost of RF (Radio Frequencies) study
- b. Actual cost of environmental studies
- c. Actual cost of engineering including, but not limited to, search ring, regulation compliance, lease negotiation, etc.

Response: See response to DR 10. As an additional objection, the request is overly board and unduly burdensome as numerous tower sites have been acquired by Alltel in various buyouts and the information either no longer exists or would require significant costs to retrieve.

15. For each wireless site owned by Alltel within the MTA, identify the following for the land on which the tower or other structure resides:

- a. Owned or leased
- b. Purchase information including original purchase price, number of square

- footage and/or acres owned, or
- c. Terms of lease including, but not limited to, effective date, number of years, price per square foot or acre(s), number of square footage and/or acres, terms for renewal

Response: See response to DR 10.

16. For each wireless site owned by Alltel and each wireless site that contains antenna space leased by Alltel within the MTA, provide the following information:

- a. Type of wireless access antenna
- b. Technology used (CDMA, GSM, AMPS, other)
- c. Height of wireless access antennas
- d. Number of wireless access antennas
- e. Actual cost of wireless access antennas including material, installation and mounting hardware

Response: See response to DR 10.

17. For each wireless site owned by Alltel and each wireless site that contains space leased by Alltel within the MTA, provide the following information:

- a. Number of microwave antennas
- b. Type of each microwave antenna
- c. Size of each microwave antenna (2', 4', 6', etc.)
- d. Technology used
- e. Height of each microwave antenna
- f. Cost of each microwave antenna including material, installation and mounting hardware

Response: See response to DR 10.

18. For the transport between each wireless site owned by Alltel and/or each wireless site leased by Alltel within the MTA to the MTSO, provide the following:

- a. Identify the type of transport (including, but not limited to, microwave, leased facilities from other telecommunication carriers, transiting via interexchange carriers, fiber, and copper)
- b. Detailed description of the circuit routing for all types of transport from the site to the MTSO
- c. Quantity and type of circuits (TIs, DSIs, DS3s, etc.)
- d. Identify usage of circuit (voice, data, etc.)
- e. Miles for each circuit
- f. Monthly lease expense, if applicable
- g. Terms of lease including, but not limited to, effective date, number of years, price per circuit, number of circuits, terms for renewal, if applicable
- h. Detailed description of the circuit routing to the transiting carrier and identification of the actual point of meet with the transiting carrier, if

- applicable
- i. Mont, Wy transiting costs, if applicable
- j. Transiting rate per minute of use, if applicable
- k. Monthly minutes of use transited and identify whether they are actual or estimated, if applicable
 - l. Size of fiber and/or copper, if applicable
- m. Length of fiber and/or copper, if applicable
- n. Actual cost of fiber and/or copper (including material, installation, and any internal costs incurred by Alltel for labor, materials and miscellaneous overheads), if applicable

Response: With respect to subparts b, c, d, e, f, g, i, k, l, m, and n, see response to DR 10. With respect to subpart a, Alltel objects to the relevancy of the request to the extent it pertains to each site within the MTA and the request is unduly burdensome. Attachment Alltel Response DR 18 identifies Alltel cell sites and switch locations within the state of South Dakota. All cell sites within South Dakota are connected to an Alltel switch within South Dakota either via an Alltel owned microwave route or via leased electrical and/or optical facilities. See also the response to Request for Production 1.

With respect to subpart h, Alltel routes traffic from its serving mobile telephone switching offices in Rapid City (CLLI RPCYSDWCCM3) and Sioux Falls (CLLI SXFLSDQACM1) to Venture via direct connections with Qwest's Sioux Falls tandem.

With respect to subpart j, Alltel pays Qwest a transit rate of \$.003123 per minute of use to 'transit' the traffic to Venture.

19. For transport between MTSO to MTSO within the MTA, provide the following:
- a. Identify the type of transport (including, but not limited to, microwave, leased facilities from other telecommunication carriers, transiting via interexchange carriers, fiber, and copper)
 - b. Detailed description of the circuit routing for all types of transport from the tower to the MTSO
 - c. Quantity of circuits (TIs, DSIs, DS3s, etc.)
 - d. Identify usage of circuit (voice, data, etc.) e. Miles for each circuit
 - f. Monthly lease expense, if applicable
 - g. Terms of lease including, but not limited to, effective date, number of years, price per circuit, number of circuits, terms for renewal, if applicable
 - h. Detailed description of the circuit routing to the transiting carrier and identification of the actual point of meet with the transiting carrier, if applicable
 - i. Monthly transiting costs, if applicable
 - j. Transiting rate per minute of use, if applicable
 - k. Monthly minutes of use transited and identify whether they are actual or estimated, if applicable
 - l. Size of fiber and/or copper, if applicable
 - m. Length of fiber and/or copper, if applicable
 - n. Actual cost of fiber and/or copper (including material, installation, and any

internal costs incurred by Alltel for labor, materials and miscellaneous overheads), if applicable

Response: See response to DR 10. As an additional objection, the request is overly board and unduly burdensome as numerous tower sites have been acquired by Alltel in various buyouts and the information either no longer exists or would require significant costs to retrieve. Subject to, and without waiving said objections, see response to RFP 1.

20. For transport between each wireless site owned by Alltel and/or each wireless site leased by Alltel within the MTA to a wireline switch, provide the following:

- a. Identify all direct and indirect connections with wire line service providers
- b. Identify the type of transport (including, but not limited to, leased facilities from other telecommunication carriers, transiting via interexchange carriers, fiber and copper)
- c. Detailed description of the circuits routing for all types of transport from the wireless site to the point of meet with the wireline service provider or the point of meet with the transiting carrier. Identify the actual point of meet with the wireline service provider or the transiting carrier.
- d. Quantity of circuits (T1s, DS1s, DS3s, etc.)
- e. Identify usage of circuit (voice, data, etc.)
- f. Miles for each circuit
- g. Monthly lease expense, if applicable
- h. Terms of lease including, but not limited to, effective date, number of years, price per circuit, number of circuits, terms for renewal, if applicable
- i. Monthly transiting costs, if applicable
- j. Transiting rate per minute of use, if applicable
- k. Monthly minutes of use transited and identify whether they are actual or estimated, if applicable
 1. Size of fiber and/or copper, if applicable
- m. Length of fiber and/or copper, if applicable
- n. Cost of fiber and/or copper including material, installation, and any internal costs incurred by Alltel for labor, materials and miscellaneous overheads, if applicable

Response: See response to DR 10. As an additional objection, the request is overly board and unduly burdensome as numerous tower sites have been acquired by Alltel in various buyouts and the information either no longer exists or would require significant costs to retrieve. Subject to, and without waiving said objections, see response to RFP 1.

21. Identify the actual costs for the switching equipment including, but not limited to, any contractor costs, any subcontractor costs, any internal labor costs incurred by an Alltel employee, any material costs incurred by Alltel, and any miscellaneous overhead costs incurred by Alltel at each MTSO within the MTA for the following items:

- a. Base station controller(s)
- b. Mobile Switching Center Equipment
- c. DC Power Supply

- d. DC to DC Converters, if applicable
- e. Backup Batteries
- f. Backup Generator
- g. Microwave radios
- h. SNMP Equipment (hubs, etc.)
- i. Transport Equipment (multiplexers, cross connect panels, etc.)
- j. Dehydrators, if applicable
- k. Front end processors (OTAP, SMS, MMS, etc.)
- l. Voice mail system
- m. Ancillary and miscellaneous equipment, terminals, relay racks, etc.

Response: See response to DR 10.

22. Identify the actual costs for the shelter equipment including, but not limited to, any contractor costs, any subcontractor costs, any internal labor costs incurred by an Alltel employee, any material costs incurred by Alltel, and any miscellaneous overhead costs incurred by Alltel at each wireless site owned by Alltel and/or each wireless site leased by Alltel within the MTA for the following items:

- a. Base Station Equipment
- b. DC Power Supply
- c. DC to DC Converters, if applicable
- d. Backup Batteries
- e. Backup Generator
- f. Microwave radios
- g. SNMP Equipment (hubs, etc.)
- h. Transport Equipment (multiplexers, cross connect panels, etc.)
- i. Dehydrators, if applicable
- j. Tower lighting system
- k. Cross connect panels
- l. Multiplexers
- m. Ancillary and miscellaneous equipment, terminals, relay racks, etc.

Response: See response to DR 10. As an additional objection, the request is overly board and unduly burdensome as numerous tower sites have been acquired by Alltel in various buyouts and the information either no longer exists or would require significant costs to retrieve.

23. For the structures within the MTA including, but not limited to, building at MTSO locations, shelters at wireless sites, warehouses, identify the following:

- a. Square footage or dimensions of the structure
- b. Actual cost of the structure including material, transportation, installation and placement, and any internal costs incurred by Alltel for labor, materials and miscellaneous overheads
- c. Identify any floor space and power that is leased to other entities

- i. Leased square footage
- ii. Monthly lease revenue
- iii. Terms of lease including, but not limited to, effective date, number of years, monthly lease rate per square foot, number of square feet, terms for renewal

Response: See response to DR 10. As an additional objection, the request is overly board and unduly burdensome as numerous tower sites have been acquired by Alltel in various buyouts and the information either no longer exists or would require significant costs to retrieve.

24. For the owned spectrum licenses within the MTA, identify the following:

- a. Type of FCC licenses
- b. Number of FCC licenses
- c. Portion of spectrum licensed, in MHz
- d. Portion of spectrum unused at this time, in MHz
- e. Actual costs for the FCC licenses

Response: See response to DR 10.

25. If any Alltel Affiliate or any Alltel unregulated service or enterprise is occupying any building space, land or is utilizing any equipment or power, identify the Affiliate, the specific Alltel resource occupied and/or utilized, the amount of costs allocated among the entities, services or enterprises.

Response: See response to DR 10.

26. Identify any detailed cost information for each transmission network project undertaken in the past five years and for each project identify if it was performed jointly with another company or an Affiliate. Include all information associated with new facility placements over the past five years.

Response: See response to DR 10.

27. Provide the information requested on the form attached as Discovery Template 1 (Network data), for each wireless site owned by Alltel, wireless site leased by Alltel and MTSO owned by Alltel within the MTA. Provide your response in electronic form.

Response: See response to DR 10.

28. Identify Alltel's wireless site electronic equipment, switches, transmission add/drop nodes and/or multiplexers, interoffice routes, intra-company and inter-company transmission facilities, and call record data collection points. Identify capacity and in-service plant associated with each switch, node, route, and/or facility. This includes any routes and/or facilities between every wireless site owned by Alltel to the MTSO in the MT A, between every wireless site leased by Alltel to the MTSO within the MT A, and

between MTSO to MTSO within the MTA.

Response: See response to DR 10.

29. Identify any overlap routes and interface points between the wireless sites owned by Alltel and the MTSO within the MTA, between the wireless sites leased by Alltel and the MTSO within the MTA, and between MTSO and MTSO within the MTA. To the extent that Alltel utilizes any ILEC facilities or owned facilities, identify facilities associated with such usage and the purpose of any such utilization.

Response: See response to DR 10.

30. Provide a network diagram of the MTA and identify where all section 251 (b)(5) reciprocal compensation calls are received, the transport required to terminate the call, and where call termination occurs.

Response: Alltel objects to the relevancy of the request as it pertains to each site within the MTA and the request is unlikely to lead to the discovery of admissible evidence. The request is also unduly burdensome. Without waiving said objection, See Alltel's response to Request for Production 6. Alltel receives 251(b)(5) traffic at all points noted on the diagrams.

31. With respect to Alltel's present network and traffic routing, for each of Alltel's wireless sites, describe in detail how a call originating from a customer served by each of the wireless access sites to a landline customer in each of Venture's rate centers.

Response: Alltel routes traffic from its cell site to the MTSO serving the cell site and from the MTSO to an intermediate carrier (an LXC or a transit provider) for delivery to Venture.

32. Identify the actual costs for general support assets (vehicles, furniture, office equipment, computers, billing system, etc.) allocated to every wireless site owned by Alltel, every wireless site leased by Alltel and the MTSO within the MTA.

Response: See response to DR 10

33. What are the annual economic depreciation rates for all the assets including, but not limited to, towers, wireless access antennas, microwave antennas, feedline, structures, electronics, power, etc.?

Response: See response to DR 10

34. Identify the current cost of capital for all elements of the network including, but not limited to, switching and transport equipment.

Response: See response to DR 10. As an additional objection, the request is overly board and unduly burdensome as numerous tower sites have been acquired by Alltel in various buyouts and the information either no longer exists or require cost

significant costs to retrieve.

35. Identify the annual maintenance expense directly related to each wireless site owned by Alltel, each wireless site leased by Alltel, and the MTSO within the MTA.

Response: See response to DR 10

36. Identify the annual overhead expenses (network operations, corporate operations, operating taxes, etc.) that will be attributed to each wireless site owned by Alltel, each wireless site leased by Alltel, and the MTSO within the MTA.

Response: See response to DR 10

37. For each MTSO providing switching services within the MTSO, provide the following:

- a. Volume of total minutes being switched in 2006
- b. Volume of total Venture-originated minutes switched in 2006
- c. Identify what portion of the minutes above are toll (both state and interstate) and what portion are local
- d. Identify whether the reported minutes are actual measured or estimated
- e. Identify the records that support the minutes

Response: With respect to traffic that does involve originating or termination to Venture, Alltel objects to this request as the information requested seeks information that is not relevant to the instant suspension proceeding or likely to lead to the discovery of admissible evidence. With respect to subpart b, Alltel does not track such minutes in the normal course of business. However, Alltel did perform a traffic study for the period November 5, 2006 to November 15, 2006 which indicates Venture-originated minutes switched by Alltel's mobile telephone switching offices in Rapid City and Sioux Falls for the study period were 103,925. See also Alltel's response to RFP 7.

38. How many minutes are terminated to an Alltel customer served by each wireless access site owned by Alltel and each wireless access site leased by Alltel within the Venture service territory and within the MTA?

Response: Alltel objects to the relevancy of the request as it pertains to each site within the MTA and the information is not likely to lead to the discovery of admissible evidence. The request is also unduly burdensome. Without waiving said objection, Alltel has not created and does not otherwise maintain information as requested.

39. Provide the information requested in the form attached as Discovery Template 2 (MOU data) by providing 2006 minute of use data, indicate whether the reported data are actual measured or estimated, and identify the records that support the responses. Provide your response in electronic form.

Response: See response to DR 10

40. Identify the volume of access minutes, messages, and revenue by month by jurisdiction for each wireless access site owned by Alltel, each wireless access leased by Alltel and MTSO within the Venture service territory and within the MT A for the period January 2005 through December 2006.

Response: Alltel objects to the relevancy of the request as it pertains to each site within the MTA and the information is not likely to lead to the discovery of admissible evidence. The request is also unduly burdensome.

41. Identify the volume of toll minutes, messages, revenue, and lines served by month by jurisdiction for each wireless access site owned by Alltel, each wireless access site leased by Alltel and the MTSO within the Venture territory and MTSO for Alltel's retail long distance for the period January 2005 through December 2006.

Response: Alltel objects to the relevancy of the request as it pertains to each site within the MTA and the information is not likely to lead to the discovery of admissible evidence. The request is also unduly burdensome. Alltel does not offer 'retail long distance' service in South Dakota.

42. Identify the number of wireless customers for each year from 2005 through 2006.

Response: Alltel had approximately 11 million wireless customers at year end 2005 and approximately 12 million wireless customers at year end 2006.

43. Identify the names and Operating Company Numbers (OCN) of all carriers with which you currently exchange any traffic and describe the terms of the arrangement, the nature of the traffic exchanged, how such traffic is routed, whether such traffic is recorded, and how such traffic is rated.

Response: Alltel believes it exchanges traffic with all carriers operating in South Dakota. Traffic is either exchanged directly or via an indirect interconnection. Alltel does not maintain carrier access billing records in the normal course of business.

44. Identify the rate for service charged to Alltel customers with a billing address in Venture's service territory.

Response: Alltel objects to this request as the information requested seeks information that is not relevant to the instant suspension proceeding and not likely to lead to the discovery of admissible evidence. Without waving such objection, Alltel's current rate offerings in South Dakota are available via the web at <http://www.alltel.com/personal/wireless/plans/index.html>.

ALLTEL'S RESPONSE TO REQUEST FOR ADMISSION

1. Admit that Alltel currently provides basic services at less than the costs of those services as reflected on the books of Alltel. If you deny this request in whole or in part, explain in detail the basis of that denial.