
BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA

In the Matter of the Petition of Brookings
Municipal Utilities d/b/a Swiftel
Communications for Suspension or
Modification of Dialing Parity, Number
Portability, and Reciprocal Compensation
Obligations

Docket No. TC07-007

**MOTION TO COMPEL RESPONSES AND PRODUCTION OF
DOCUMENTS ADDRESSED TO ALLTEL COMMUNICATIONS, INC. 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 Alltel Communications, Inc. (Alltel) to provide substantive, non-evasive responses to discovery requests 3, 4, 7, 8, 9, 10, 11, 13, 14, 19, 21, 23, 24, 25, 26, 36, 37, and 38, and Request for Admission 1, and to produce the documents requested in Requests for Production of Documents 9, 12, 14 contained in the Discovery Requests of Brookings Municipal Utilities d/b/a Swiftel Communications to Alltel dated June 9, 2008. Because the information sought in these discovery requests and requests for production of documents is relevant and discoverable, Alltel's objections should be overruled and Alltel should be directed to provide meaningful answers and to produce documents responsive to the subject discovery and document requests.

In addition, Swiftel requests that it be allowed to file a further motion, if necessary, to compel Alltel 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 Alltel has not provided the required oath supporting its responses, Alltel has stated that it will provide the oaths. However, if such oaths are not provided within a reasonable time, Swiftel will seek to compel compliance with SDCL 15-6-33(a).

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 Alltel's objections and response, are provided before Swiftel's argument in connection with each such objection and response.

INTERROGATORIES (Int.) 3, 7, 8, 9

Interrogatory 3: Identify each Telecommunications Carrier you have exchanged Telecommunications Traffic with, either directly or indirectly, during the past 12 months in South Dakota.

Objection: This interrogatory seeks information that is irrelevant and not likely to lead to discovery of admissible evidence. Alltel's traffic exchange with other carriers has no bearing on the merit of Petitioner claims in this proceeding.

Response: Without waiving the foregoing objection, Alltel believes it exchanges telecommunications traffic with all carriers operating in South Dakota.

Interrogatory 7: Identify all interconnection arrangements Alltel has entered into 1) in South Dakota and 2) in MTA 12.

Objection: This interrogatory seeks information that is irrelevant and not likely to lead to the discovery of admissible evidence. Alltel's interconnect relationship with other carriers is not relevant to Petitioner's suspension request.

Response: Without waiving the foregoing objection, Alltel has interconnection agreements with most incumbent local exchange carriers in Minnesota, North Dakota and South Dakota. Such agreements are on file with the respective state commissions and are a matter of public record.

Interrogatory 8: Identify all carriers by name and by NPA-NXX from whom you port numbers and to whom you port numbers 1) in MTA 12; and 2) in the Swiftel service area.

Objection: This interrogatory seeks information that is irrelevant and not likely to lead to the discovery of admissible evidence. Alltel's number porting with other carriers is not relevant to the circumstances associated with Petitioner's suspension request.

Response: Without waiving the foregoing objection, Alltel does not maintain the information as requested. See attached Alltel Response - DR 8 for identification of carriers by name with whom Alltel has processed number ports in 2008 in the states of Minnesota, North Dakota, and South Dakota.

Interrogatory 9: Identify any switch not owned by Alltel that is directly or indirectly interconnected with any of your switches. Include the owner, status (affiliate or specified third parties, including local exchange Carriers, interexchange Carriers, and CMRS carriers), model, physical location, and date of interconnection for each such switch.

Response: Alltel switches are connected to the Public Switched Telephone Network and hence, Alltel switches are directly or indirectly connected with all switches identified in the Local Exchange Routing Guide.

ARGUMENT

The information sought by Swiftel is relevant because it will provide evidence related to Swiftel's cost estimates in the Petition. As shown in the cost exhibits, the number of carriers to whom Swiftel may be required to transport traffic and the location to which Swiftel may be required to transport traffic will affect the cost of transport.

Alltel states at its response to Discovery Request 16 that Swiftel is required to transport traffic to any point in the LATA. The LATA in which Swiftel operates is the majority of

the state of South Dakota. Accordingly, by its own statements, Alltel alleges as a practical matter that Swiftel could be required to transport traffic to any point of interconnection in South Dakota that Alltel may have with another carrier. Accordingly, the identification of all telecommunications carriers with whom Alltel has exchanged Telecommunications Traffic (Interrogatory 3); the identification of interoffice transport routes, intercompany transmission facilities, points of interconnection with other carriers (Interrogatory 4); the identification of all interconnection arrangements Alltel has entered in South Dakota and in MTA 12 (Interrogatory 7); the identification of all carriers from whom Alltel ports numbers and to whom Alltel ports numbers in MTA 12 and in the Swiftel service area (Interrogatory 8); and the identification of switches not owned by Alltel that are directly or indirectly interconnected with Alltel's switches (Interrogatory 9), is relevant to this inquiry. Thus, Alltel's objections must be denied.

With respect to Alltel's response in 3, 7, and 9, Alltel's answers are not responsive to the questions. For example, in Interrogatory 3, Alltel states that it "believes" it exchanges telecommunications traffic with all carriers operating in South Dakota, which leaves open the possibility that Alltel does not exchange traffic with some carriers. Alltel does not identify any Telecommunications Carrier in South Dakota with whom it exchanges traffic, nor does it identify the carriers with whom it does not exchange traffic with the result that Alltel's answer is not responsive to the question asked. Alltel uses the same type of language to provide a non-response to Interrogatory 7 concerning its interconnection arrangements. If Alltel has interconnection agreements it should simply state as much and identify with whom, as the interrogatory requests.

The same applies to Alltel's response to Interrogatory 9. In Interrogatory 9, Alltel is asked to identify the switches it interconnects with that it does not own, including identification of the owner, status, model, physical location, and date of interconnection associated with each switch. Alltel responds that it interconnects indirectly to every switch in the United States because it interconnects to the Public Switched Telephone Network. Alltel also refers Swiftel to the Local Exchange Routing Guide (LERG). The LERG, however, does not provide all of the information that Swiftel requests. Because Alltel did not object to this question, it should be required to provide a complete response.

INTERROGATORY 4

Interrogatory 4: Identify all Alltel switches, interoffice transport routes, intercompany transmission facilities, points of interconnection with other carriers, and call record data collection points in the state of South Dakota and in MTA 12. Identify capacity and in-service plant associated with each switch, transport transmission equipment, route, and/or facility.

Objection: This interrogatory seeks information that is irrelevant and not likely to lead to discovery of admissible evidence.

Response: Without waiving the foregoing objection, see Response to Interrogatory 17.

ARGUMENT

This question concerns the location of certain Alltel facilities and the amount and method of routing certain kinds of traffic by Alltel. This information is necessary to determine the costs associated with transporting calls, especially where Swiftel would be required to transport such calls outside its territory. Alltel specifically denies all allegations made by Swiftel in the Petition, and the information requested is relevant to

determining the economic burden placed upon Swiftel by the requirements of LNP, Dialing Parity, and Reciprocal Compensation. Further, Alltel's method of routing traffic impacts Swiftel as such traffic can end up on Swiftel's network for transport through any number of indirect interconnections. Therefore, information about Alltel's routing of traffic also is relevant.

With respect to the information provided by Alltel in Interrogatory 4, Alltel only identified two switches. It did not provide any information on interoffice transport routes, intercompany transmission facilities, points of interconnection with other carriers, etc. Accordingly, Alltel's answer is not complete.

INTERROGATORIES 10, 23 and 24

Interrogatory 10: Quantify the volume of traffic (by MOU) sent to Swiftel for termination for the last 12 months and for year end 2000-2007, inclusive, by the following traffic types:

- a) IntraMTA Wireless
- b) InterMTA Wireless
- c) through the Qwest tandem.

Objection: This interrogatory seeks information that is irrelevant and not likely to lead to the discovery of admissible evidence. The traffic that Alltel sends to Petitioner has no relevance to Petitioner requests in this proceeding.

Response: Without waiving the foregoing objection, Alltel does not maintain the information as requested. Further, Petitioner has or should have the information requested, the volume of traffic it receives from Alltel.

Interrogatory 23: Identify the 1) interMTA MOU and 2) the intraMTA MOU that Alltel terminated to Swiftel by month for the years 2004 through 2008.

Objection: This interrogatory seeks information that is irrelevant and not likely to lead to the discovery of admissible evidence. The traffic that Alltel sends to Petitioner has no relevance to Petitioner request in this proceeding.

Response: Without waiving the foregoing objection, Alltel has not captured and does not otherwise maintain information as requested. Additionally, Petitioner has or should have the information requested.

Interrogatory 24: Identify any Alltel traffic on trunk groups between the Qwest tandem and a rural ILEC end office and terminating to the rural ILEC end office by month and for each year from 2002 through 2008.

Objection: This interrogatory seeks information that is irrelevant and not likely to lead to the discovery of admissible evidence. The traffic that Alltel sends to rural ILECs has no relevance to Petitioner request in this proceeding.

Response: Without waiving the foregoing objection, see response to Interrogatory 23.

ARGUMENT

This information will support Swiftel's method of determining the costs associated with transporting traffic and in calculating the economic impact on Swiftel associated with dialing parity and reciprocal compensation. This information also is necessary to test various claims made by Alltel in its testimony. For example, at page 4 of Mr. Williams' testimony, Alltel alleges that there is no need for Swiftel's suspension petition because Swiftel has been able to successfully negotiate interconnection agreements with Alltel and others. Further, at page 10, Mr. Williams states that Swiftel has overstated the need for transport by modeling direct connections to each competitor, when other connections (indirect connections) would be more efficient. Alltel also states that it is indirectly connected to Swiftel and that it terminates traffic to Swiftel through Qwest. Accordingly, the relative merits and efficiency of direct versus indirect connections is relevant to this proceeding and to Alltel's claims. Swiftel seeks information from Alltel to test those claims and, accordingly, Alltel's objections should be denied.

With respect to Alltel's responses, Alltel claims that it does not maintain the information as requested and that Petitioner has or should have the information requested. Swiftel challenges Alltel's claims. For traffic sent through Qwest, only Alltel and Qwest know how much traffic is Alltel traffic and only Alltel and Qwest know the origination and termination of such traffic. This is because Qwest sends Qwest traffic and the traffic of other carriers to Swiftel over a common trunk. Accordingly, Swiftel is unable to identify the carrier originating any traffic that does not have appropriate identifying information. Further, Swiftel is unable to identify whether traffic is interMTA or intraMTA because it does not know the call origination point. This is commonly referred to as phantom traffic. Swiftel receives a large volume of phantom traffic via the Qwest trunk. Swiftel has no relationship with Qwest in connection with this traffic. However, Alltel pays Qwest to transmit its traffic to Swiftel. Accordingly, Alltel should either have in its possession or be able to obtain from Qwest, the information requested.

INTERROGATORIES 11, 25, and 26

Interrogatory 11: For each of the three most recent years for which the data is available, 1) provide total revenues; 2) provide the average revenue per month per customer.

Objection: This interrogatory seeks information that is irrelevant and not likely to lead to discovery of admissible evidence. Alltel's financial performance has no relevance to Petitioner's suspension request.

Interrogatory 25: Provide Alltel's net income generated on an annual basis for the years 2000 through 2007, inclusive. Provide Alltel's net income generated on an annual basis in South Dakota for the years 2000 through 2007.

Objection: This interrogatory seeks information that is irrelevant and not likely to lead to discovery of admissible evidence. Alltel's financial performance has no relevance to the Petitioner's suspension request.

Interrogatory 26: Provide Alltel's return on investment for the years 2004 through 2007.

Objection: This interrogatory seeks information that is irrelevant and not likely to lead to the discovery of admissible evidence. Alltel's financial performance is irrelevant to Petitioner's suspension request.

ARGUMENT

Interrogatories 11, 25, and 26 seek information on Alltel's financial performance because such information bears on the impact that the grant of Swiftel's petition will have on Alltel and on the other competing carriers in the areas Swiftel serves. Alltel argues in its Response to Swiftel's Petition that, "the Swiftel request is inconsistent with the public interest in a competitive exchange market." Although Alltel leaves this statement completely unsubstantiated, responses to the Interrogatories noted above are relevant to the impact granting Swiftel's Petition will have on the economic and competitive climate in the affected market and therefore, whether or not Swiftel's request is consistent with the public interest.

Interrogatory 13: Identify all rate centers for which Alltel has populated the LERG to rate calls to one rate center and route calls to a different rate center 1) in South Dakota and 2) in the US. Explain the circumstances under which Alltel populates the LERG to rate calls to one rate center and route calls to a different rate center.

Objection: This interrogatory seeks Information that is irrelevant and not likely to lead to the discovery of admissible evidence. Without waiving the forgoing objections, see attached Alltel

Response - DR 13 for detail of 605-NXXs. Similar rating and routing assignment patterns occur throughout Alltel's service area. Alltel's general policy with respect the establishment of separate rating and routing points is to achieve efficient interconnection and traffic routing conditions in a manner consistent with the Central Office Code Administration Guidelines (COCAG).

ARGUMENT

The attachment provided by Alltel does not show the rate centers requested by Interrogatory 13 and therefore is not responsive to the question. Such information is relevant to the proceeding because bears directly on the economic impact on Swiftel and its customers from a grant of the Petition. The information is necessary to determine the costs associated with Swiftel's compliance with the obligations of LNP, dialing, and reciprocal compensation and to refute Alltel's claim that a grant of the Petition is not in the public interest. Routing of calls to one rate center while routing them through another has an impact on the cost of routing any such calls in the case of ported numbers.

Interrogatory 14: State whether Alltel allows its subscribers to select a long distance carrier other than Alltel.

Objection: This interrogatory seeks information that is irrelevant and not likely to lead to the discovery of admissible evidence. Alltel's customer service offerings have no relevance to Petitioner's suspension request and is not likely to lead to the discovery of admissible evidence.

ARGUMENT

Swiftel argues in its Petition at page 19 that granting the requested modification would serve the public interest by ensuring choice of long distance providers for consumers. In its Response at page 4, Alltel contends that Swiftel's request is inconsistent with the public interest. Therefore, information regarding whether and how Alltel allows its customers to select a long distance carrier is relevant to this proceeding. Alltel cannot now refuse to provide such information on the basis that it is irrelevant when Alltel challenged the validity of Swiftel's assertion.

Interrogatory 19: Describe how Alltel assigns telephone numbers to subscribers. Does Alltel only assign telephone numbers to subscribers in the rate center in which they reside? In the rate center that corresponds to the subscriber's billing address?

Objection: This interrogatory seeks information that is irrelevant and not likely to lead to the discovery of admissible evidence. Alltel's customer service offerings, including number assignment methods, have no relevance to Petitioner's suspension request.

Response: Without waiving the foregoing objection, Alltel assigns numbers to subscribers based on the subscriber's community of interest.

ARGUMENT

Interrogatory 19 is reasonably calculated to lead to the discovery of admissible evidence relevant to (1) how Swiftel will be able to determine and verify the origin, nature and intercarrier compensation (reciprocal compensation or access charges) of wireless traffic that may be delivered to it for termination; and (2) whether Swiftel may be required to transport (or pay for the transport of) calls to wireless customers with local Brookings telephone numbers far outside Swiftel's local exchange service area.

Furthermore, Alltel's answer is not responsive to the question. Alltel does not object to the request as being unduly burdensome and should therefore be compelled to respond with the information requested.

Interrogatory 21: Does Alltel contend that it is required to pay access charges on all calls from its wireless subscribers that originate in MTA 12 and outside of Swiftel's service area and terminate to a Swiftel ILEC subscriber? If no, describe the calls that would not be subject to access charges.

Objection: This interrogatory seeks information that is irrelevant and not likely to lead to the discovery of admissible evidence. Alltel originated traffic sent to Petitioner is irrelevant to Petitioner request in this proceeding.

ARGUMENT

The payment of access charges is relevant to the economic impact of toll dialing parity on Swiftel and its customers and it is also relevant to the public interest in granting

Swiftel's Petition. Alltel should be required to furnish the information requested in Interrogatory 21.

INTERROGATORIES 36, 37 AND 38

Interrogatory 36: What is the price 1) per subscriber and 2) per share that Verizon will pay to Alltel under the recently announced merger agreement?

Objection: This interrogatory seeks information that is irrelevant and not likely to lead to discovery of admissible evidence.

Interrogatory 37: What is the anticipated MOU that a combined Alltel-Verizon will terminate to Swiftel? What is the anticipated MOU that Swiftel will terminate to a combined Alltel/Verizon?

Objection: This interrogatory seeks information that is not relevant or likely to lead to the discovery of admissible evidence. Without waiving the objection, Alltel does not know the volume traffic that is exchanged between Verizon and Swiftel See also Objection and Response to Interrogatories 10 and 34.

Interrogatory 38: As a result of the recently announced merger between Alltel and Verizon, is it anticipated that either Verizon or Alltel will divest certain 1) frequencies or 2) properties in South Dakota? If yes, identify the frequencies and properties that will be divested or which you expect will be divested.

Objection: This interrogatory seeks information that is not relevant or likely to lead to the discovery of admissible evidence. Without waiving the foregoing objection, Alltel does not presently know the answer.

ARGUMENT

In his testimony at page 4, Alltel Witness Williams states that Alltel is not seeking to expand or deviate from the parties mutually agreed contractual obligations. Currently, Alltel and Verizon Wireless both operate in Swiftel's service territory as entirely separate entities. Swiftel's cost exhibits are based on these entities as two separate entities. If that is not the case as a result of the merger, then Swiftel's cost estimates may need to be

revised. Also, the current interconnection arrangements with Alltel and Verizon Wireless may be changed if their traffic is combined as a result of the merger. This also would impact Swiftel's cost exhibits. On the other hand, if the property of one of the companies is to be sold to a new carrier, this could impact Swiftel's cost exhibits concerning the cost of transport because the new carrier could select a point of interconnection different from Alltel's. The information sought in Interrogatory 36 also goes to the issue of whether Swiftel's petition is in the public interest because it will provide evidence to show that grant of Swiftel's request will not harm Alltel, Verizon Wireless or competition.

Accordingly, Alltel's relevance challenge to these questions must be denied.

Admission 1: Admit that when Swiftel hands traffic off to SDN which ultimately terminates to Alltel, Swiftel and Alltel are indirectly interconnected. If you deny this statement, explain the basis for your denial.

Response: Admitted as to the traffic originated by Swiftel, except to the extent that SDN may be determined to be an affiliate of Swiftel or dedicated facilities are used.

ARGUMENT

Alltel's admission is vague and not responsive to the request because it does not clearly state the circumstances for its exception, leaving Swiftel to guess at what situations Alltel contends that an indirect interconnection exists and when it does not. Alltel should be compelled to respond clearly and unequivocally on this topic, defining and explaining the situations in which it contends the two companies are indirectly interconnected, and in which circumstances, if any, it contends they are not indirectly interconnected.

Request for Production 9: Please provide copies of all your annual ETC certification filings made with the South Dakota Public Utilities Commission (Commission) since

January 1, 2003, including any responses to or correspondence with Commission Staff regarding the filings or information included in such filings.

Objection: This request seeks information that is irrelevant and not likely to lead to the discovery of admissible evidence.

ARGUMENT

Swiftel argues in its Petition that the costs of implementing LNP, dialing parity, and reciprocal compensation principles without modification would result in an unduly burdensome economic impact. Swiftel also has argued that grant of its Petition is in the public interest. Alltel has denied the same in its Response to the Petition and has further argued that grant of the Petition would harm competition. The information requested is relevant to determine whether grant of Swiftel's Petition will have any financial impact on Alltel and the impact that granting Swiftel's Petition would have on Alltel's ability to provide competitive services.

Request for Production 12: Please provide a copy of a trunk diagram for traffic routed between Alltel and Petitioner showing how all traffic types are routed between Alltel and Petitioner.

Response: Alltel does not know how all traffic is routed from Petitioner; however as Petitioner routes such traffic, Petitioner should have this information. Also see attached - Alltel Response RFP12.

ARGUMENT

The diagram provided by Alltel does not show the types of traffic routed via the various trunks shown on the diagram. Accordingly, Alltel's response is not complete.

Request for Production 14: Provide a copy of the recently announced merger agreement between Verizon and Alltel.

Objection: This request is seeking information that is irrelevant and not likely to lead to discovery of admissible evidence and is requesting information that is confidential, proprietary and competitively sensitive and may not be released in accordance with the terms of a confidentiality agreement between the parties to the transaction.

ARGUMENT

The merger agreement between Verizon and Alltel impacts virtually all aspects of Alltel that are relevant to these proceedings – financial information, method of routing and transporting traffic, costs may change as a result of the merger agreement. Such factors, as has been indicated above, have bearing on the analysis of the public interest in granting Swiftel’s Petition. The merger agreement also impacts the economic and competitive climate of the market, which is argued by Alltel as an important factor in whether Swiftel’s Petition should be granted.

CONCLUSION

For all of the above reasons, Swiftel requests that the Commission direct Alltel to provide complete, non-evasive substantive responses to discovery requests 3, 4, 7, 8, 9, 10, 11, 13, 14, 19, 21, 23, 24, 25, 26, 36, 37, and 38, and Request for Admission 1, and to produce the documents requested in Requests for Production of Documents 9, 12, 14 contained in the Discovery Requests of Brookings Municipal Utilities d/b/a Swiftel Communications to Alltel dated June 9, 2008. Swiftel also asks the Commission to compel Alltel 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

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July 11, 2008

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 11th day of July, 2008, a copy of the **Motion to Compel Responses and Production of Documents Addressed to Alltel Communications, Inc. as Propounded by Brookings Municipal Utilities D/B/A Swiftel Communications** was served via electronic mail and by U.S. Mail, postage prepaid, to the following:

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