

EXHIBIT 1 TO ALLTEL'S MOTION TO COMPEL –
Santel

CONTAINS: RELEVANT RESPONSES TO ALLTEL'S
INTERROGATORIES AND REQUEST FOR PRODUCTION
DATED FEBRUARY 29, 2008

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA**

**IN THE MATTER OF THE PETITION OF
SANTEL COMMUNICATIONS
COOPERATIVE, INC FOR
ARBITRATION PURSUANT TO THE
TELECOMMUNICATIONS ACT OF 1996
TO RESOLVE ISSUES RELATING TO
AN INTERCONNECTION AGREEMENT
WITH ALLTEL, INC.**

DOCKET No. TC 07-115

**SANTEL COMMUNICATIONS
COOPERATIVE, INC.S RESPONSES TO
ALLTEL'S INTERROGATORIES AND
REQUESTS FOR PRODUCTION OF
DOCUMENTS**

FIRST SET OF INTERROGATORIES MADE BY ALLTEL

DR 1 For each Data Request, identify each person who assisted in the preparation of these responses, or who provided information for the purpose of preparing these responses.

RESPONSE: These responses were prepared by Consortia Consulting, Vantage Point Solutions, General Manager Ryan Thompson, and undersigned counsel. Consortia Consulting assisted with those responses pertaining to the FLEC study. Vantage Point Solutions assisted with those responses pertaining to the InterMTA analysis and the FLEC study.

DR 2 Provide 2007 minute of use data by your terminating CLLI code. State the type of traffic (i.e., intra-exchange voice traffic, intra-exchange dial-up ISP traffic, inter-exchange local and/or EAS, CMRS, intrastate toll, and interstate toll) whether the reported data are actual measured or estimated, and identify the records that support the responses. If 2007 usage is not available provide data for the most current period measured for each type of traffic.

- (a) To the extent the MOU data provided differs from the MOU data used in Petitioner's cost study filed in this proceeding, explain and reconcile the differences.
- (b) To the extent the MOU data provided herewith are actual, identify all usage terminating to an ISP trunk group.
- (c) To the extent the MOU data are actual, identify all usage originated to Alltel and the trunk group that carries that traffic to Alltel.
- (d) To the extent the MOU data provided is an estimate, explain the method by which ISP-bound traffic (i.e., dial-up internet traffic) estimate was derived.

The total investment in Account 2111 was \$60,051.88 as of 12/31/06. \$41,447.06 can be allocated to Central Office and \$18,604.82 can be allocated to non-central office purposes.

The total investment in Account 2121 was \$2,685,310.20 as of 12/31/06. \$1,212,689.79 can be allocated in Central Office and \$1,472,620.41 can be allocated to non-central office purposes.

DR 9 Identify all federal and state universal service support received for 2006 and 2007 for each study area in which Petitioner is providing service.

OBJECTION AND RESPONSE: Petitioner objects to this request on the basis that it seeks information which is not relevant to this proceeding. Petitioner further objects to this request on the basis that it is not reasonably calculated to lead to the discovery of relevant or admissible evidence. The requirements for the development of a FLEC study does not require consideration of Universal Service and therefore receipt of any such funding is irrelevant and immaterial to the issues identified in this arbitration proceeding.

DR 10 Provide copies of all documents upon which you rely to support your answers to all Data Requests.

RESPONSE: See exhibits attached hereto and identified herein.

DR 11 Provide complete cost models, cost schedules, work papers or other documentation underlying switching “price inputs” contained in the “Price Inputs” spreadsheet of each of your FLEC Model. This documentation should identify:

- (a) Composition of Switch Processor prices in terms of quantities and unit investments for hardware and software. (Provide separately quantities and unit investments for standalone, host and remote switches.)
- (b) Composition of Trunk Card prices in terms of quantities and unit investments for hardware and software, if any.
- (c) Various “loading” factors used, such as engineering and installation factors, sales tax factors, miscellaneous construction cost factors and others.
- (d) Composition of other switch investments, if any.

RESPONSE: See Exhibit F attached hereto and incorporated herein by this reference.

DR 12 Provide the sources of unit investments identified in DR11. These may include analyses of actual switch investments, analyses of vendor quotes, analyses based on vendor switch configuration models used for construction estimates or others.

RESPONSE: The source of the unit investment associated with the switch electronics estimates is based upon a composite of proposals received from switching electronics vendors for entities other than Santel Communications Cooperative. The pricing utilized is specific to projects of similar size and scope to the Santel Communications Cooperative network.

DR 13 Provide vendor or other documentation describing the engineering of “Switch Processor” hardware and software components in terms of the following:

- (a) Whether the capacity (and costs) of hardware or software components are demand volume-sensitive or volume-insensitive.
- (b) If volume-sensitive, the demand variable that causes exhaust of the component (switched line terminations, BH CCS, BH call attempts, BH milliseconds, *etc.*).
- (c) The capacity (maximum and/or at engineered fill) of the component.
- (d) And, the utilization of the component for each RLEC inherent in its FLEC Model.

Provide responses separately to the extent engineering parameters vary by switch type – standalone, host or remote switches.

OBJECTION AND RESPONSE: Petitioner objects to this request on the basis that it is overly broad and unduly burdensome. Petition further objects to subpart (d) of this request on the basis that it fails to properly define the terms and parameters necessary in order to adequately respond to this request. Without waiving these objections, Petitioner responds as follows:

- (a) The capacity of the switch processor components is volume-sensitive.
- (b) Multiple volume-sensitive variables may be limiting factors that can exhaust the capacity of the switch processor function. These variables include concurrent calls and Busy Hour Call Attempts (BHCA).
- (c) Softswitching technologies as assumed for this network utilize distributed processing that increases processing capabilities as demand increases. For the host sites, 1,008 to 2016 concurrent calls can be processed at Parkston and 2016 to 4032 concurrent calls can be processed at Woonsocket depending on traffic patterns. For remote sites, 192 to 384 concurrent calls can be processed depending on

DR 20 Provide the complete cost models, cost schedules, work papers or other documentation underlying switched transport electronics by exchange and for the three equipment categories. This documentation should identify:

- (a) Composition of the investment (by exchange and equipment category) in terms of equipment items (name and description), quantities and unit investments.
- (b) Basis for equipment item quantities in terms of total demand and the engineering parameters used to determine quantities needed to serve total demand.
- (c) Source of unit investments; *e.g.*, analyses of actual switched transport electronics installations, analyses of vendor quotes, analyses based on vendor configuration models or other.

RESPONSE: See Exhibit G attached hereto and incorporated herein by this reference.

DR 21 Confirm that the following switched trunks (DSOs) are consistent with the total interoffice minutes of use, such that the resulting minutes of use/trunk is a valid measure of trunk usage. If not, provide consistent quantities.

RLEC	Switched Trunks	Total IO MOU	MOU/Trunk
Santel Comm.	1,349	44,885,603	33,273

RESPONSE: The switched trunks are consistent with the total interoffice minutes of use.

DR 22 Provide your current or most recent measure of interoffice trunk utilization (annual MOU/trunk) and the supporting work papers used to compute the measure.

OBJECTION: Petitioner objects to this request on the basis that it is overly broad and unduly burdensome. Petitioner further objects to this request on the basis that it seeks information which is not required in conformance with the development of a FLEC analysis. Petitioner further objects to the extent that such request improperly suggests that the Petitioner has a duty to continuously update its FLEC study as each input becomes more currently available.

DR 23 Provide a breakdown of the special circuit (paths) quantities by bandwidth as shown in the table below.

RLEC	Special Circuits (paths)	DS0	DS1	DS3	OC3	OC12	OC48
Santel Comm.			79				

OBJECTION AND RESPONSE: Petitioner objects to this request on the basis that it is overly broad and unduly burdensome. Petitioner further objects to this request on the basis that it seeks information which is not required in conformance with the development of a FLEC analysis. Without waiving this objection, the special circuit paths consist of 16 DS-0 paths and 63 DS-1 paths.

DR 24 For each special circuit bandwidth describe the proportion of OC-192 equipment capacity consumed by one circuit of each bandwidth. Provide capacity consumption separately for common equipment and plug-ins. (For example, a DS0 special circuit may consume 1/(24 X % engineering fill) of a DS1, a DS1 may consume 1/(84 X % engineering fill) of an OC3 plug-in; and, an OC3 plug-in may require one slot on the OC-192 common equipment. Likewise, an OC3 special circuit may require one OC3 plug-in and consume one slot of common equipment.)

OBJECTION: Petitioner objects to this request on the basis that it seeks information which is neither relevant nor reasonably calculated to lead to the discovery of relevant or admissible evidence. Petitioner further objects to this request on the basis that it seeks information which is not related to the FLEC study used in connection with this proceeding.

DR 25 Provide a copy of the documentation describing the architecture, equipment and engineering rules/parameters for the OC-192 transport system represented in your cost studies, or for one commonly used.

OBJECTION AND RESPONSE: Petitioner objects to this request to the extent that it seeks information which is confidential and proprietary and is the subject of a third-party non-disclosure agreement. Petitioner further objects to this request to the extent that it seeks information that is equally available to Alltel and the burden on Alltel to obtain the requested information is no greater than the burden on Petitioner. The OC-192 SONET electronics included in the estimates for the FLEC model is available from a number of vendors, including Alcatel-Lucent, Cisco Systems, Fujitsu Network Communications and Nortel Networks. The requested information can be obtained directly from these vendors.

DR 26 Provide measures of utilization of OC-192 transport electronics underlying the FLEC Model as shown in the following table.

DR 32 Provide cable investments per foot (urban and rural) for 12- and 24-fiber buried fiber cables, similar to the 48-fiber cable (BFO48) investments per foot reflected in the FLEC Models.

OBJECTION: Petitioner objects to this request on the basis that it seeks information which is neither relevant to this proceeding nor is it likely to lead to the discovery of relevant or admissible evidence. Petitioner further objects to this request to the extent that it seeks information that is equally available to Alltel and the burden on Alltel to obtain the requested information is no greater than the burden on Petitioner.

DR 33 In computing the % of fiber-miles in service for transport (vs. non-transport), provide the rationale for not including the fiber-miles used by digital loop carrier (DLC) in the total fiber-miles in service (*i.e.*, the denominator or total demand for fiber-miles)?

RESPONSE: The forward looking engineering design does not include DLC fibers in the interoffice transport plant

DR 34 Provide the current or most recent average quantity of trunks or DS0 circuits per DS1. Provide source data and supporting calculations.

OBJECTION: Petitioner objects to this request on the basis that it seeks information which is neither relevant to this proceeding nor reasonably calculated to lead to the discovery of relevant or admissible evidence. This information is not required for the development of an appropriate FLEC model.

DR 35 Provide the current or most recent average quantity of switched lines per common transport trunk or DS0 circuit.

OBJECTION: Petitioner objects to this request on the basis that it seeks information which is neither relevant to this proceeding nor reasonably calculated to lead to the discovery of relevant or admissible evidence. This information is not required for the development of an appropriate FLEC model.

DR 36 Santel Communications' "Fiber Table" (Santel FLEC:00056) indicates the RLEC has 239.00 miles of fiber cable used for transport (eleven cable routes). Why does the 288.32 miles of fiber cable reflected in the Santel FLEC Model substantially exceed actual cable length?

OBJECTION AND RESPONSE: Petitioner objects to this request on the basis that it seeks information which is neither relevant to this proceeding nor reasonably likely to lead to the discovery of relevant or admissible information. Without waiving this objection, the FLEC study conducted for