

Exhibit B

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

IN THE MATTER OF THE COMPLAINT)	DOCKET NUMBER TC 09-098
OF SOUTH DAKOTA NETWORK, LLC,)	
AGAINST SPRINT COMMUNICATIONS)	
COMPANY LP)	NORTHERN VALLEY
IN THE MATTER OF THE THIRD)	COMMUNICATIONS, LLC'S
PARTY COMPLAINT OF SPRINT)	OBJECTIONS AND RESPONSES TO
COMMUNICATIONS COMPANY L.P.)	SPRINT COMMUNICATIONS
AGAINST NORTHERN VALLEY)	COMPANY L.P.'S 2012
PROPERTIES, INC., NORTHERN)	INTERROGATORIES, REQUESTS
VALLEY COMMUNICATIONS, INC.,)	FOR ADMISSIONS AND DOCUMENT
SANCOM, INC., AND CAPITAL)	REQUEST
TELEPHONE COMPANY)	

TO: Sprint Communications Company L.P., and its lawyers, Philip Schenkenberg, BRIGGS AND MORGAN, P.A., 80 South Eighth Street, 2200 IDS Center, Minneapolis, MN 55402 and Talbot J. Wiczorek, GUNDERSON, PALMER, NELSON & ASHMORE, LLP, 440 Mount Rushmore Road, Third Floor, P.O. Box 8045, Rapid City, SD 57701.

GENERAL OBJECTIONS

Northern Valley's General Objections are incorporated into each of its responses to the discovery requests below as though set forth fully therein.

1. Privileged Information. Northern Valley objects to Sprint's discovery Requests to the extent that all or any of them call for the disclosure or production of information or material protected from disclosure by the attorney-client privilege, attorney work product doctrine, trade secret, or any other privilege, immunity, or grounds that protect information from disclosure, including protections for material prepared in anticipation of litigation. Any inadvertent disclosure of any such information or material is not to be deemed a waiver of any such privilege or protection. Requests that purport to require production of such information and material are oppressive, burdensome and posed to harass. Northern Valley does not intend to waive such objections to the extent any such protected information is disclosed.

INTERROGATORY NO. 124: Identify any expert witness you have retained to provide testimony in this matter; identify all documents he or she has been provided; and identify all facts provided to and relied on by the expert.

RESPONSE: Northern Valley objects to this Interrogatory on the grounds that it is premature as Northern Valley has not identified any expert testimony that it will present at the hearing. Northern Valley further objects to the interrogatory insofar as it seeks information beyond that permitted to be obtained under the South Dakota Rules of Civil Procedure. Northern Valley further objects to this request insofar as Sprint seeks information that it has itself refused to produce in response to Northern Valley's discovery requests.

Subject to and without waiving its objections, Northern Valley will present its case in its pre-filed testimony in accordance with the prehearing schedule set by the Commission or will otherwise respond to this request to the extent that Sprint provides similar information either voluntarily or as ordered by the Commission.