

# Exhibit 2

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA

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IN THE MATTER OF THE COMPLAINT      DOCKET NO. TC 09-098  
OF SOUTH DAKOTA NETWORK, LLC,  
AGAINST SPRINT COMMUNICATIONS  
COMPANY LP

IN THE MATTER OF THE THIRD  
PARTY COMPLAINT OF SPRINT  
COMMUNICATIONS COMPANY L.P.  
AGAINST NORTHERN VALLEY  
PROPERTIES, INC., NORTHERN  
VALLEY COMMUNICATIONS, INC.,  
SANCOM, INC., AND CAPITAL  
TELEPHONE COMPANY

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DEPOSITION OF

JAMES GROFT

Volume I  
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Taken September 26th, 2011

By Jenelle K. Lundgren

1 high level. Did you say Northern Valley began  
2 providing voice service back in the mid-'90 --  
3 mid to late '90s?

4 A No, I did not say that. We turned on our first  
5 video customer in 2000, January of 2000, I  
6 believe. The company was created before then.

7 Q I see. I see. So when -- Northern Valley was  
8 then certificated in about 2000 to provide voice  
9 services, I think?

10 A It would have been before that, but in that  
11 general time frame.

12 Q All right. And, at that time, was that in  
13 Aberdeen only?

14 A No. We are certificated to provide service  
15 throughout the state.

16 Q Was it Qwest areas?

17 A Yes, just in Qwest areas.

18 Q Did you roll out service first in Aberdeen?

19 A Yes.

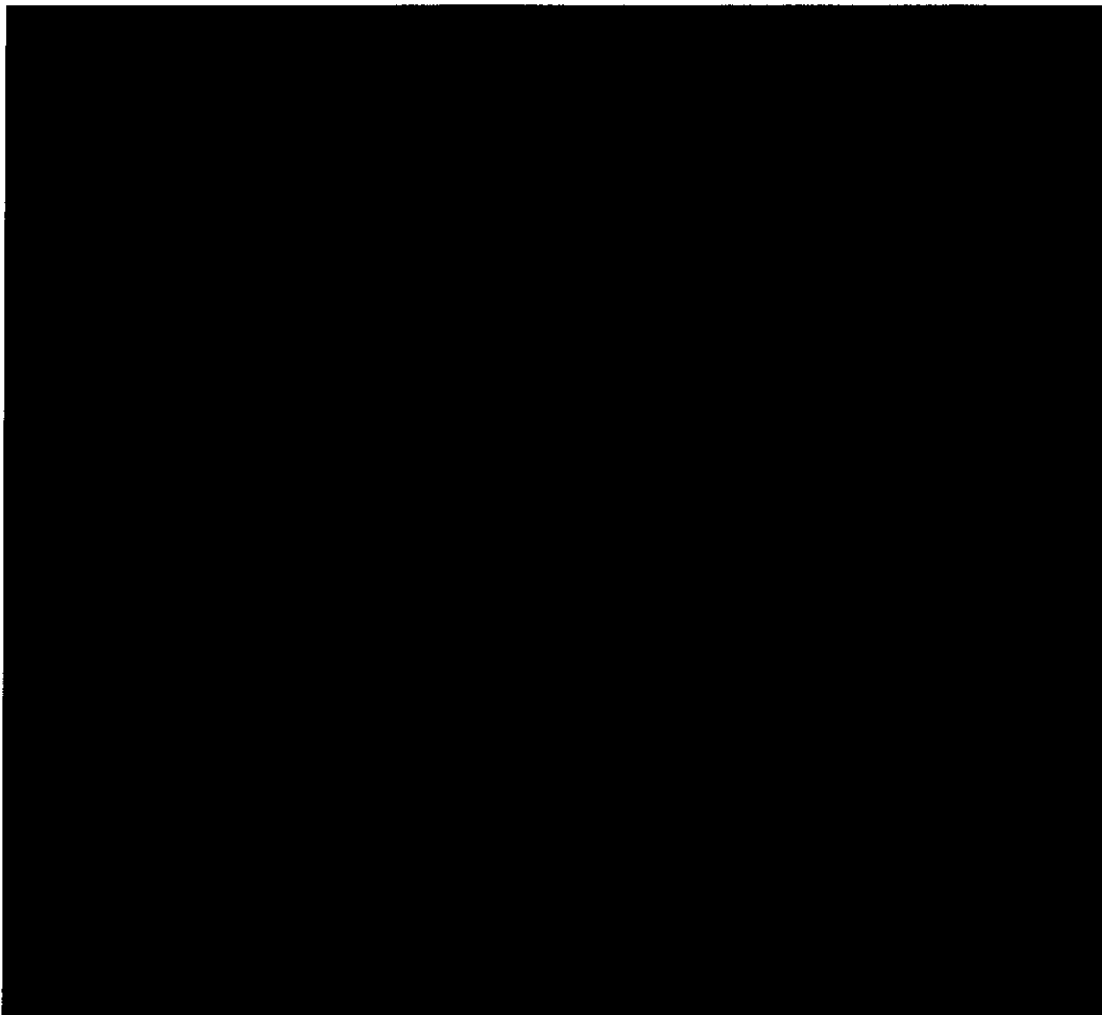
20 Q I think Redfield, you rolled out service later?

21 A Yes. It would have been more like the 2007 time  
22 frame for Redfield.

23 Q So let's look at the 2003-2004 time frame. At  
24 that point, Northern Valley is providing  
25 competitive services in Aberdeen. At a high

1 level, how were calls -- and let's take calls  
2 from my client, Sprint, that would go through  
3 SDN. How were calls being delivered to a  
4 traditional residential voice customer?

5 A Can you clarify that as -- do you mean the  
6 transport network or what do you mean?



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22 Q What does that mean?

23 A It's a Siemens -- I don't know what the EWSD  
24 stands for, but it's a Siemens product.

25 Q Was that a switch that was used solely for

1 Northern Valley?

2 A No, it was used for both James Valley and  
3 Northern Valley calls.

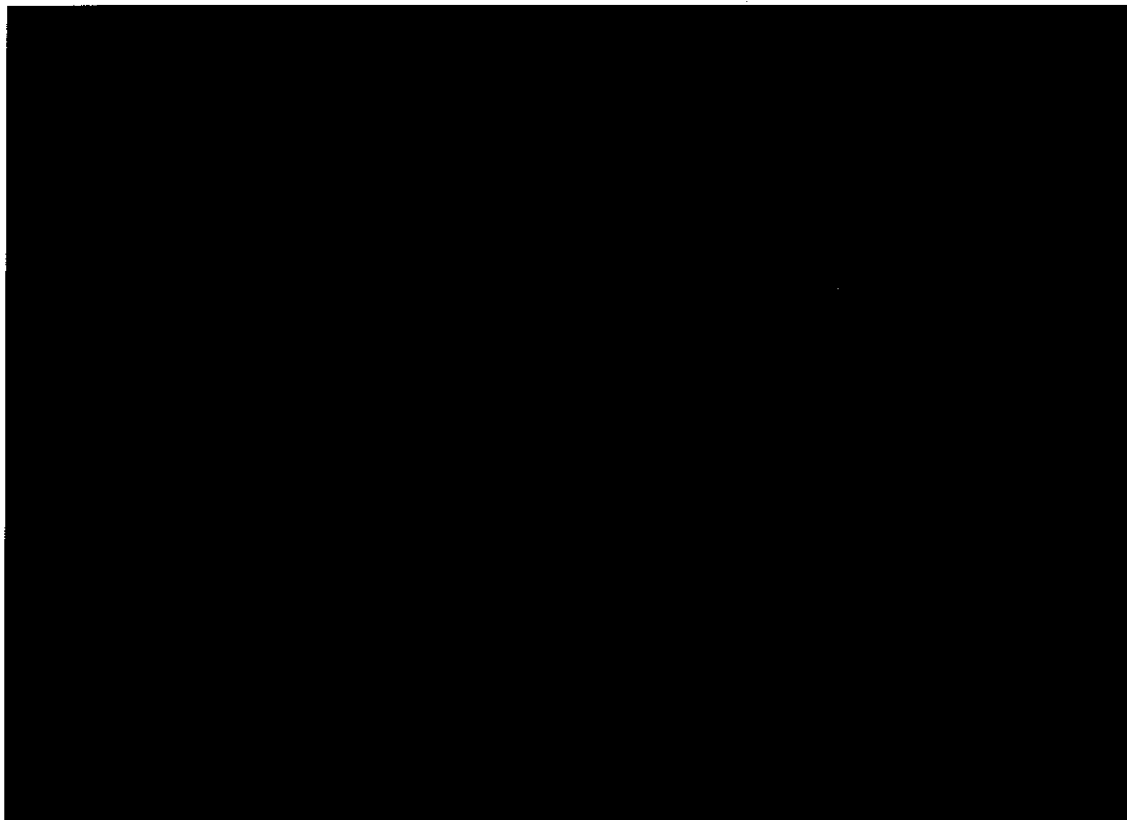
4 Q Okay. And so, in Groton, if there were two  
5 calls, one call was going to the ILEC, one to the  
6 CLEC, they would go on the same transport  
7 circuits between SDN and Groton?

8 A No. We had separate transport paths: one for  
9 Northern Valley, one for James Valley.

10 Q Okay. And the transport -- these circuits for  
11 Northern Valley went into the EWSD switch and  
12 were switched to go to Aberdeen?

13 A Correct.

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1 Q And the remote piece of the Meta is in Redfield?

2 A Yes.

3 Q So, today, a Sprint call to a residential  
4 Northern Valley customer would come into Groton  
5 from SDN?

6 A Yep.

7 Q Would be switched by the EWSD; right?

8 A Yes.

9 Q Would go on the Aberdeen ring?

10 A Sorry, I thought you were asking for a Redfield  
11 customer.

12 Q Did I say Redfield?

13 MR. CARTER: You didn't say either.

14 Q (By Mr. Schenkenberg continuing): Okay. Let's  
15 make it Aberdeen.

16 A Okay.

17 Q My apologies. Would go on the Aberdeen ring;  
18 right?

19 A Yep.

20 Q Would hit a node?

21 A Yes.

22 Q Would be directed to the residential end user?

23 A Correct.

24 Q A similar call to Redfield would go into Groton  
25 from SDN, would go on the larger ring, and would

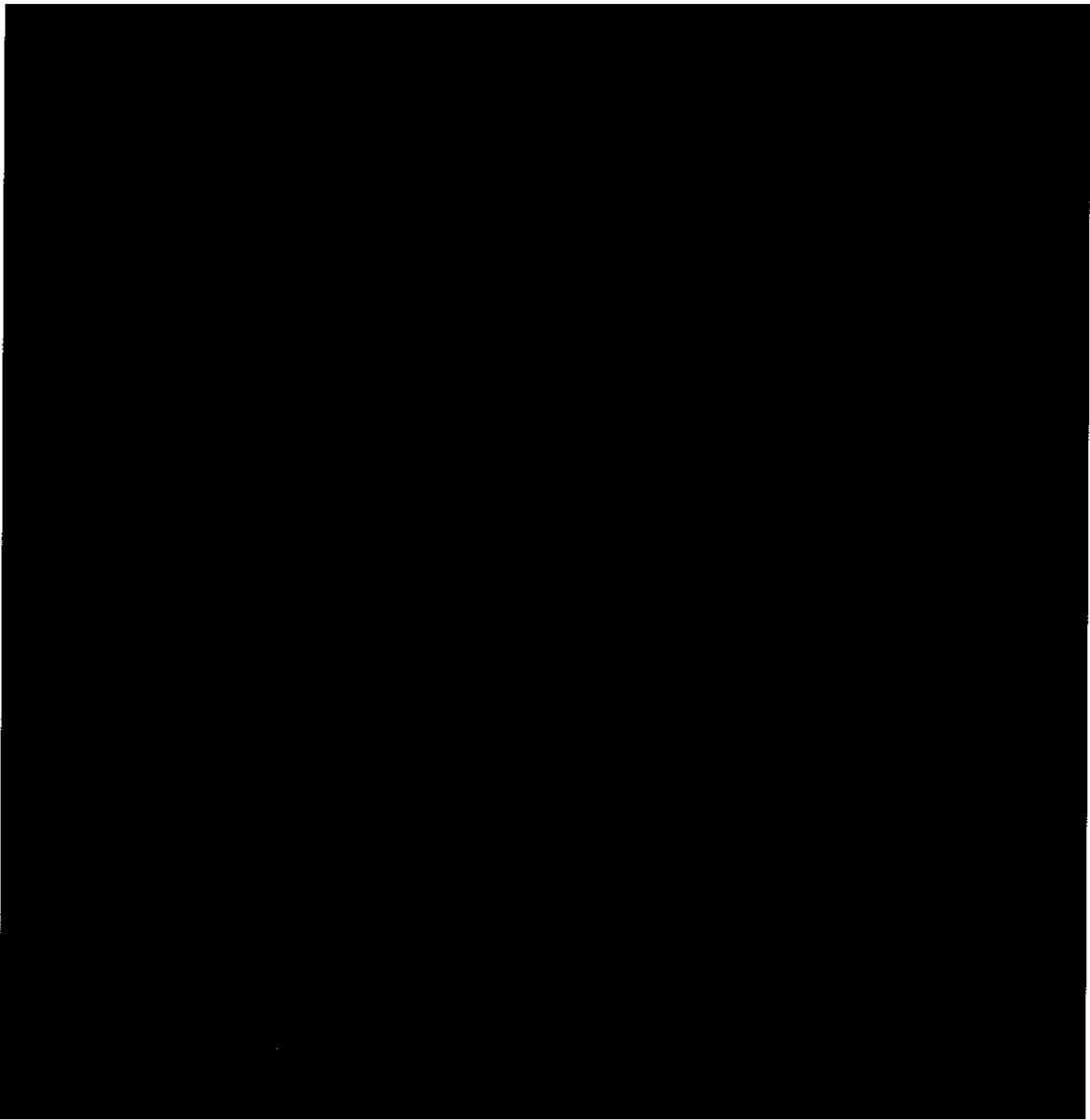
1 hit a node in Redfield or would hit the  
2 Metaswitch in Redfield?

3 A We actually only have one node in Redfield and so  
4 it would hit the node in Redfield at this time.

5 Q The only calls that are going to hit the  
6 Metaswitch remote are calls that hit the  
7 Metaswitch host; is that correct?

8 A Correct.

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1 like, an hour. You want to take a break?

2 MR. SCHENKENBERG: This is a great  
3 time.

4 (A recess was taken.)

5 Q (By Mr. Schenkenberg continuing): All right.  
6 You know, I think what I want to do right now --  
7 since we've gotten a good start on technical  
8 stuff and I told you that was going to be high  
9 level and it was, I want to go ahead and jump  
10 30(b)(6) Topics 11 and 13. And, really, why  
11 don't you look at Exhibit 1. And can I ask you  
12 to drill down on some of these things that we've  
13 talked about?

14 A Okay.

15 Q And to the extent it's helpful to use Exhibit 2,  
16 we can use Exhibit 2. So Topic 11 is "The  
17 network path taken by calls by Sprint to CCCs."  
18 And I think we defined CCC as call connection  
19 company, which I think we've decided today that  
20 we're just going to refer to as conference call  
21 companies?

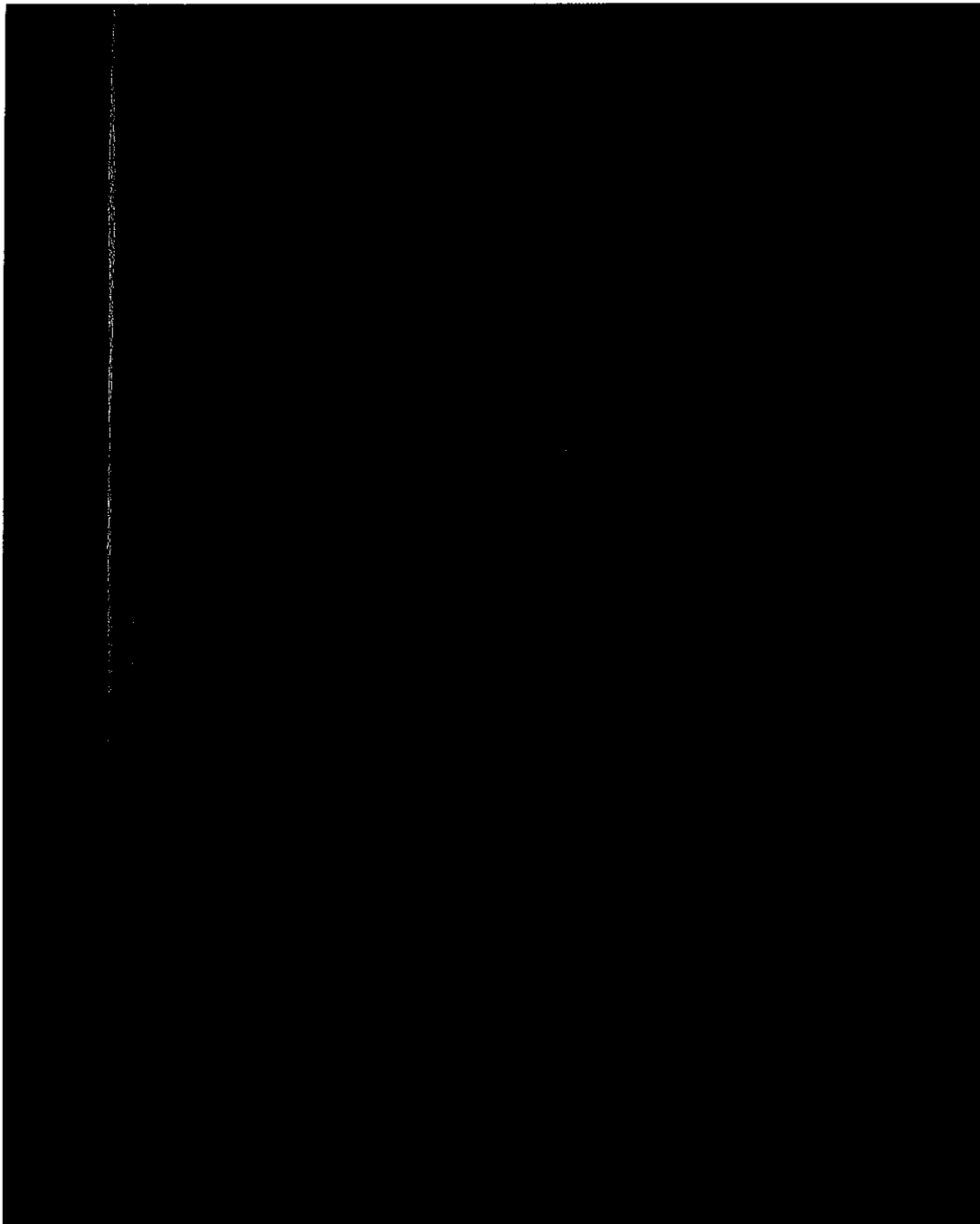
22 A Yes.

23 Q Okay. "Including the function and ownership of  
24 equipment and facilities utilized, and whether  
25 any calls terminated outside of Northern Valley's



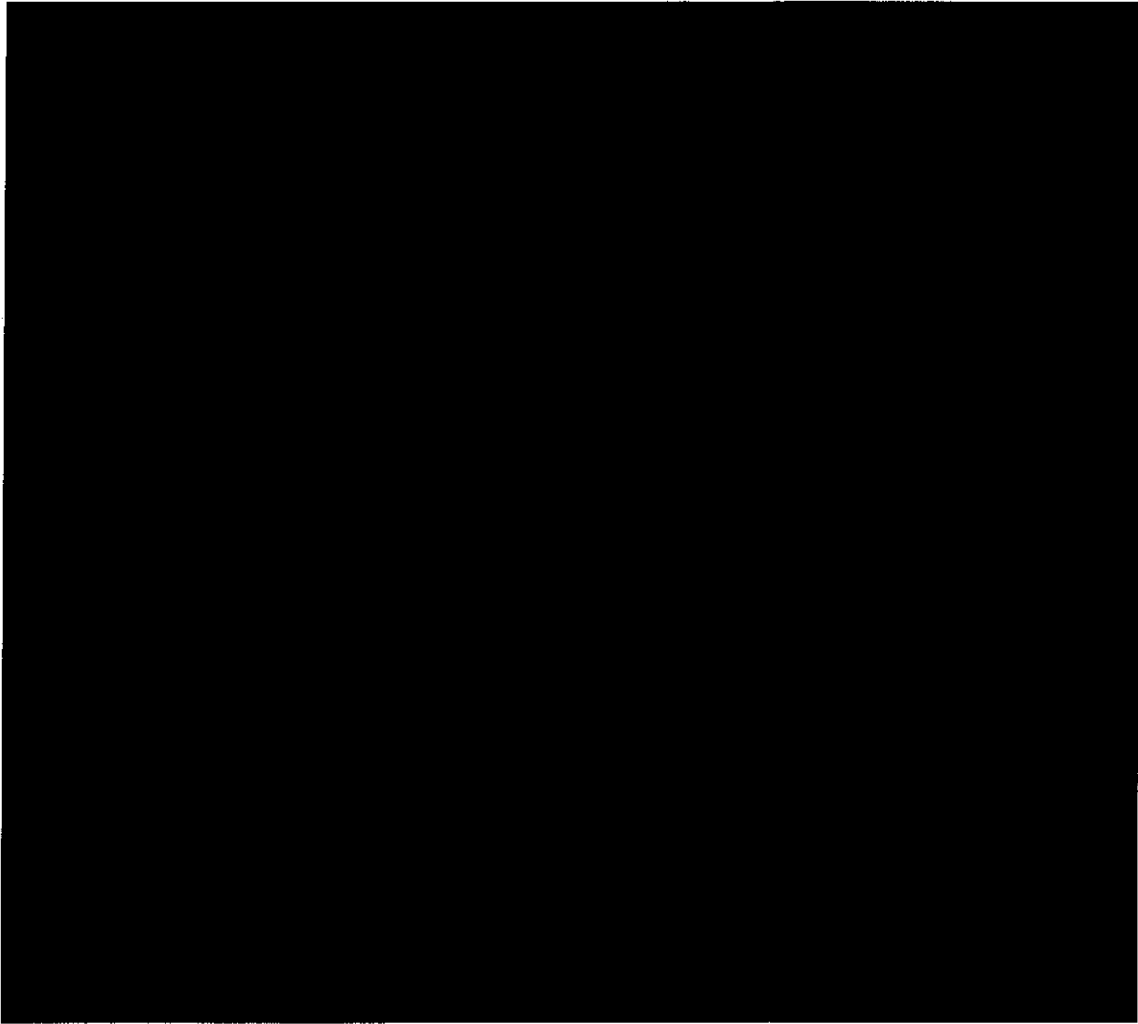
1 service area." And, again, some of this, we've  
2 already talked about at a high level. Sprint  
3 calls -- and we're talking about long distance  
4 calls from Sprint that go through SDN; correct?

5 A Yes.



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MR. SCHENKENBERG: You want to take a  
break?

MR. CARTER: That's fine.

(A recess was taken.)

