## **EXHIBIT 1**

## TO AFFIDAVIT OF SCOTT G. KNUDSON

2/20/13

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

IN THE MATTER OF THE APPLICATION OF NATIVE AMERICAN TELECOM, LLC FOR A CERTIFICATE OF AUTHORITY TO PROVIDE LOCAL EXCHANGE SERVICE WITHIN THE STUDY AREA OF MIDSTATE COMMUNICATIONS, INC.

Docket No. TC11-087

# NATIVE AMERICAN TELECOM, LLC'S OBJECTIONS AND RESPONSES TO SPRINT COMMUNICATIONS COMPANY L.P.'S DISCOVERY REQUESTS

Native American Telecom, LLC ("NAT") hereby submits its objections and responses to Sprint Communications Company L.P.'s ("Sprint") Discovery Requests.

#### GENERAL OBJECTIONS

NAT incorporates the following objections into each of its specific objections below.

- 1. NAT objects generally to each discovery request to the extent it seeks information protected by the attorney-client privilege, the attorney work product doctrine, common interest doctrine, joint defense privilege, or any other applicable privilege or right.
- 2. NAT objects generally to each discovery request to the extent it is overbroad and seeks information not relevant to the subject matter of this action or reasonably calculated to lead to the discovery of admissible

this Certificate for Authority matter.

REQUESTS FOR ADMISSIONS

REQUEST FOR ADMISSION NO. 1: Admit that NAT needs a certificate

to serve non-tribal members, even on the Reservation.

ANSWER: Deny

REQUEST FOR ADMISSION NO. 2: Admit that Free Conferencing

Corporation is a non-tribal member.

ANSWER: Admit

REQUEST FOR ADMISSION NO. 3: Admit NAT is currently providing

local exchange service within the Reservation.

ANSWER: Admit

REQUEST FOR ADMISSION NO. 4: Admit NAT is currently offering

interexchange service within the Reservation.

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### VERIFICATION

I, Jeff Holoubek, state that I have first-hand knowledge of the matters set forth above and hereby verify that, to the best of my knowledge and belief, the allegations and statements contained herein are true and correct.

Dated this 9th day of March, 2012.

NATIVE AMERICAN TELECOM, LLC

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By: Jeff Holoubek

Its: President

STATE OF CALIFORNIA

COUNTY OF Los Argeles )

Subscribed and sworn to before me this \_\_\_\_\_ day of March, 2012.

Notary Public

My Commission Expires: \0.8.15

(SEAL)



### CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of NATIVE AMERICAN

TELECOM, LLC'S OBJECTIONS AND RESPONSES TO SPRINT

COMMUNICATIONS COMPANY L.P.'S DISCOVERY REQUESTS was

delivered via electronic mail on this 9th day of March, 2012, to the

following parties:

Service List (SDPUC TC 11-087)

/s/ Scott R. Swier
Scott R. Swier