

EXHIBIT 2

**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
FIRST SUPPLEMENTAL OBJECTIONS AND RESPONSES
TO SPRINT COMMUNICATIONS COMPANY L.P.'S
DISCOVERY REQUESTS**

Native American Telecom, LLC ("NAT") hereby submits its **FIRST SUPPLEMENTAL** 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

evidence, and to the extent that the requests are vague and ambiguous or unduly burdensome.

3. NAT objects generally to each discovery request insofar as it purports to require NAT to inquire of all of its current and former employees, agents and representatives to determine whether information responsive to the question exists on the grounds that such an inquiry would be unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. NAT will therefore limit its inquiry to the appropriate employees currently employed by NAT that have or have had responsibility for matters to which the discovery request relates.

4. NAT objects generally to each discovery request to the extent that the information requested is known to Sprint or its counsel, or to the extent they require disclosure of information, documents, writings, records or publications in the public domain, or to the extent the information requested is equally available to Sprint from sources other than NAT.

Please see NAT's specific objections and responses attached hereto.

Dated this 18th day of January, 2013.

SWIER LAW FIRM, PROF. LLC

/s/ Scott R. Swier

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INTERROGATORIES

INTERROGATORY NO. 2: Identify and describe the services, goods, or products you have provided to Free Conferencing Corporation, including all features and practices associated with the provision of each service, the specific tariff or contract provision(s) pursuant to which each service, good, or product has been provided.

RESPONSE/OBJECTIONS: *Subject to and notwithstanding the aforementioned general objections, NAT also objects that the terms in this interrogatory ("services," "goods," "product") are vague, overbroad, and ambiguous. Moreover, such information is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence in this Certificate for Authority matter.*

FIRST SUPPLEMENTAL RESPONSE/OBJECTIONS: *The services provided to Free Conferencing Corporation are described in NAT's South Dakota Tariff No. 1 (Section 5.1, Page 1), and NAT's Tariff FCC No. 3. (Section 4.1, Page 89). See "NAT's Response to Sprint's Interrogatory No. 2" (attached).*

LOCAL EXCHANGE TELECOMMUNICATIONS TARIFF

SECTION 5 - LOCAL EXCHANGE SERVICE

5.1 Nationwide Calling Plan

NAT's local exchange service enables the Customer to:

- receive calls from other stations on the public switched telephone network;
- access NAT's calling services as set forth in this Tariff;
- access intrastate, interstate and international calling services provided by NAT and other common carriers;
- access toll-free telecommunications services such as 800 NPA;
- access 9-1-1 service for emergency calling; and
- access other operator and directory assistance services.

The Nationwide Calling Plan includes the following bundle of services:

- Local Exchange Service, including unlimited local voice calling
- Unlimited 1+ long distance minutes each month. Applies to direct dialed, 1+ long distance or 1+ intraLATA toll calls made to points within the Continental U.S., Alaska, Hawaii, Puerto Rico, and U.S. Virgin Islands.
- The following Calling Features:
 - Number Blacklist
 - Call Forward All
 - Call Forward Busy
 - Call Forward No Answer/Unavailable
 - Call Waiting
 - Do Not Disturb

Basic Nationwide Calling Plan cannot be used for long distance access to the Internet, or for high-volume business purposes such as telemarketing or autodialing. Unlimited long distance only applies to the telephone line on which this plan is assigned.

Monthly Recurring Charge, per line \$35.00

EUCL charges will be applied according to the Company's FCC tariff.

Issued: November 4, 2011

Effective Date: November 4, 2011

Issued By: Jeff Holoubek, President
253 Ree Circle
Fort Thompson, South Dakota 57339

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