

**EXHIBIT A –Motion to Compel Highlighted Interrogatories  
And Requests for Production**

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

In the Matter of the Aventure Communication )  
Technology, LLC d/b/a Aventure ) Docket No. TC11-010  
Communications' Access Tariff No. 3 )

**AT&T's FIRST SET OF DISCOVERY REQUESTS  
TO AVENTURE**

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AT&T Communications of the Midwest, Inc., ("AT&T") pursuant to SDCL 15-6-33,34 and the South Dakota Rules of Civil Procedure, and any acts amendatory thereof, hereby serves this First Set of Discovery Requests to Aventure Communication Technology, LLC in the above-captioned proceeding.

**INSTRUCTIONS**

Each request must be answered by July 25, 2011 with answers, under oath, to AT&T's Attorney William M. Van Camp at the law office of Olinger, Lovald, McCahren & Reimers, P.C., P. O Box 66, 117 E. Capitol, Pierre, South Dakota 57501, or such other place as may be agreed by the parties. These requests are continuing in nature and amended answers are to be served promptly when additional information is available to you, directly or indirectly, that would render incomplete, incorrect or misleading any answer previously provided.

Please repeat each data request and identify the individual(s) supplying the response. Where a request calls for a response in multiple parts, each part should be separated in the response so that the response is understandable and complete with respect to each part. If a

request is not clearly understood or questions arise related to a request, promptly contact the undersigned counsel for clarification.

#### DEFINITIONS

1. “Aventure” shall mean Aventure Communication Technology, LLC and its predecessors and assigns, including without limitation, its officers, directors, employees, agents, consultants, attorneys, affiliates and subsidiaries.

2. “CLEC” shall mean competitive local exchange carrier as that term is used and understood in the Telecommunications Act of 1996.

3. “Conference call company” means any provider of voice conferencing or chat-line services.

4. “Customer” shall mean any and all natural persons, corporations, businesses, firms, companies, partnerships, unincorporated associations, governmental or public agencies, and others that purchase service for a fee from any Aventure tariff, whether filed at the federal or state level.

5. “Describe” when used in reference to a document or other communication means to identify the type of document or communication, the date created or made, the people involved in communication, the present location or possession of the document or other recorded evidence of communication, and the substance content of the document or other communication.

6. “Describe” when used in reference to a factual situation or allegations means to state with particularity all facts known connected with, bearing upon, or relating in any way to the matters on which inquiry is made.

7. “Document,” or “documentation,” shall include, without limitation, any correspondence, writing, DVD, CD, graphic material, note, report, summary, manual, draft, calendar, log, photograph, plan, invoice, diary, ledger, journal, data or other recorded communication of any kind—regardless of medium and whether or not original or draft including additional writing thereon or attached thereto—that is responsive to the request.

8. “FCSC” or “FCSCs” means free calling service company or companies, which includes but is not limited to, entities that offer free calling services (which may include conference bridges, chat lines, international calling, interstate calling, etc.) and for which their customers may or may not pay.

9. “Identify, identity or identification” when used in herein shall mean provide the full name, title, business address and telephone number of any relevant individuals or, when used in reference to documentation, shall mean to state the type of document (e.g., letter, memorandum, policy, circular, book, etc.) and the location of such documentation by business address.

10. “ILEC” refers to incumbent local exchange carrier as that term is used and understood in the Telecommunications Act of 1996.

11. “IUB” or “Board” shall refer to the Iowa Utilities Board.

12. “LEC” shall mean local exchange carrier as that term is defined in 47 U.S.C. § 153(26).

13. “List,” “explain,” “specify,” or “state” shall mean to set forth fully, in detail, and unambiguously each and every fact of which you, your company or your agents or representatives have knowledge which is relevant to the answer called for by the request.

14. “Network element” shall mean a facility or equipment used in the provision of any mobile, telecommunications or Internet-type service. Such term also includes features, functions, and capabilities that are provided by means of such facility or equipment, including but not limited to subscriber numbers, databases, signaling systems and information sufficient for billing, collection, transmission, routing and other connections.

15. “PUC” shall refer to the South Dakota Public Utilities Commission.

16. “PIU” shall mean Percent Interstate Usage as described and utilized in Aventure’s suspended South Dakota Tariff No. 3.

17. “VoIP” shall mean Voice over Internet Protocol.

18. “You” or “your” includes without limitation Aventure Communication Technology, LLC and its predecessors, assigns, affiliates, subsidiaries, officers, agents, directors, employees, and consultants.

19. Any references to “§ 251 (b) and (c)” are references to 47 U.S.C. § 251 (b) and 47 U.S.C. § 251 (c).

#### DATA REQUESTS & REQUESTS FOR PRODUCTION

**1-1 Please produce a copy of all Aventure discovery responses provided to any other party in this proceeding.**

**1-2 Please produce all the depositions and deposition exhibits taken of Aventure personnel or agents from IUB Docket No. FCU-07-2. Include any exhibits produced as a result of requests made during those depositions.**

1-3 Please produce a complete copy of Aventure’s certificate of formation, Certificate of Authority, Articles of Organization and Operating Agreement along with all amendments thereto.

**1-4 Please produce a copy of Aventure’s original business plans and any subsequent plans.**

1-5 Please produce all documents provided to any investors in Aventure to induce them or Aventure Holdings, LLC, to invest in Aventure.

- 1-6 Please identify each named officer (e.g., President, General Manager, Chief Technical Officer, Chief Operating Officer, Chief Financial Officer, Treasurer, etc.) of Aventure and provide a short narrative of their education and work experience.
- 1-7 Please provide an organization chart showing Aventure's business structure reflecting all affiliates, subsidiaries, partnerships and joint ventures.
- 1-8 Please identify each and every owner and their respective percentage ownership of Aventure.
- 1-9 For each owner of Aventure and owner of any Aventure parent firm, please identify each and every affiliated business entity in which such owner has an ownership interest.
- 1-10 Please produce all contracts between Aventure and any of its agents or affiliates and any South Dakota or Iowa Local Exchange Carrier and any of its affiliates, including interconnection agreements, commercial agreements, etc.
- 1-11 Please provide Aventure's complete income statement, balance sheet, statement of changes in equity and statement of cash flows for all calendar or fiscal years ended in 2008 through June 30, 2011 at a total company level and separately for South Dakota operations.
- 1-12 Please provide a complete copy of the Aventure Trial Balance at the lowest most detailed account level as of each December 31 for 2008 through 2010 at a total company level and separately for South Dakota operations.
- 1-13 Please provide a complete Continuing Property Record (CPR) in machine readable format detailing Aventure's long-lived assets as of each December 31 for 2008 through 2010 at a total company level and separately for South Dakota operations.
- 1-14 Please identify the actual depreciation rate utilized by Aventure in each calendar year from 2008 to 2010 for each type of long-lived asset, indicating the account or subaccount number for each asset to which depreciation expense is booked on Aventure's books of account.
- 1-15 Please identify the amount of accumulated depreciation on Aventure's books of account for each type of long-lived asset as of each December 31 for 2008 through 2010 at a total company level and separately for South Dakota operations.
- 1-16 For each year from 2008 to present, please identify by title, the five most highly compensated employees of Aventure, their basic wages and their total compensation.
- 1-17 For each year from 2008 to present, for the employees identified in 1-16 please describe the distribution and allocation of their basic wages and their total compensation to each affiliate, subsidiary, partnership and joint venture.

1-18 Please identify the number of employees for Aventure by title at year end for each year from 2008 to 2010 and at the present date and indicate the affiliate, subsidiary, partnership or joint venture by whom they were employed.

1-19 Please identify all employees of Aventure as of December 31, 2010 by name, job title, job duties, employment start date, and total W2 compensation for 2010.

1-20 Please provide a schematic or diagram of Aventure's Iowa and planned South Dakota network or existing South Dakota network if it exists identifying the major network equipment and components (e.g., leased transport, tandem and end office switches, radio towers, etc).

1-21 Please identify the physical address where the equipment is housed or is planned to be housed in South Dakota and Iowa that will enable the provision of a) Aventure basic local exchange service, b) Aventure internet service, c) Aventure Long Distance, d) Aventure voice mail.

1-22 Please identify the prices Aventure intends to charge for the provisioning of basic local exchange service, custom calling features such as Caller ID, internet service, long distance service, voice mail service and any other service Aventure intends on providing in the state of South Dakota.

1-23 Aventure has asserted it "owns its tandem and end office switching equipment and associated equipment."

a. Please state the total number of tandem switches, located or planned to be located in Iowa and South Dakota, or planned to serve the South Dakota market, that Aventure owns or plans to own and their physical location(s) or planned physical location(s). Identify the type and manufacture of the tandem switches identified.

b. Please state the total number of end office switches, located or planned to be located in South Dakota and Iowa, that Aventure owns or plans to own and their physical location(s) or planned physical location(s). Identify the type and manufacture of the end office switches identified.

c. Please produce all vendor invoices and contracts for each switch identified in subparts a and b, above.

d. Please produce a network architecture diagram of the interconnection trunking arrangements between Aventure owned or planned switches for the switches identified in subparts a and b above, and any other Aventure owned or planned network elements both in Iowa and South Dakota.

e. Please produce a list of service providers that Aventure is directly interconnected with (e.g., has either a direct trunk group or an IP (internet protocol)) link between network elements.

f. Please produce a network architecture diagram of, or plan of, the existing or planned interconnection arrangements between Aventure's network and other directly interconnected service providers both in Iowa and South Dakota.

g. Explain the function that the tandem-switch provides with respect to traffic going to conference bridges.

**1-24 Please identify the total number and location of all non-test telephone access lines in service by month for each year from 2008 to the present in Iowa and South Dakota.**

1-25 Please identify any known differences between Aventure's physical network as it is used for provision of interstate access services versus its use for provision of intrastate access service.

1-26 Please identify each parcel of land in Iowa and South Dakota owned by Aventure by physical address, acquisition cost and date of acquisition.

1-27 Please identify each building in Iowa and South Dakota owned by Aventure by physical address, acquisition cost and date of acquisition. Please identify each lease of building space, including collocation leases, by Aventure by physical address and provide a copy of each building and/or collocation lease agreement.

1-28 Aventure's Tariff FCC No. 3 at Original page 57, section 5.1 A states that "At the Company's option, the End User Common Line Charge may be included as part of the monthly recurring line charge assessed to the End User." Please indicate whether Aventure charges separately for the End User Common Line (EUCL) charge or if it has opted to include or plans to include the EUCL in the monthly recurring line charge assessed to the end user in Iowa and South Dakota.

1-29 Produce all documents that demonstrate that Aventure charges or plans to charge its customers for EUCL.

**1-30 Please produce copies of a recent invoice or monthly bill to a residential end user in South Dakota and Iowa who subscribes to each of the following: a) basic local telephone service, b) local telephone service and custom calling features such as Caller ID, c) local telephone service and custom calling features such as Caller ID and Aventure internet service, d) local telephone service and custom calling features such as Caller ID, Aventure internet service and Aventure voice mail.**

1-31 Please produce the invoice(s) and any contracts associated with Aventure's purchase or lease of the following items described on Aventure's web site (<http://www.aventurenat.com/faq/>): a) outdoor antenna, b) outdoor radio, c) outdoor mounting materials, d) indoor ATA Router, e) telephone adapter and f) wireless router.

**1-32 Please identify the monthly recurring and non-recurring charges or planned charges to be assessed on customers in both Iowa and South Dakota for each of the following: a) outdoor antenna, b) outdoor radio, c) outdoor mounting**

materials, d) indoor ATA Router, e) telephone adapter and f) wireless router. If there are no applicable rates or charges but the costs of any of these items are included in the basic monthly service rate, please so indicate.

1-33 Please identify the typical or average installed cost to Aventure of customer premises equipment provided by Aventure to an end user broken out between a) the outdoor antenna, radio and mounting materials and b) the indoor ATA Router and Telephone Adapter.

1-34 Please identify all Aventure-leased interoffice facilities in Iowa and South Dakota by route name, beginning and ending points by address and common language location identifier, as well as the distance between the beginning and ending points.

1-35 Please identify the number of residential customers in both South Dakota and Iowa in service as of December 31 for each year from 2008 through 2010 and as of June 30, 2011 and:

a. Identify the number of residential customers that physically reside in each location served.

b. Separately identify the services Aventure supplies to the residential customers physically residing in South Dakota and Iowa.

c. State whether Aventure offered or offers any of these residential customers a share of its intercarrier compensation revenue.

d. Identify how many of these residential customers are employees of Aventure, if any.

1-36 Please identify the number of business service customers in both South Dakota and Iowa in service as of December 31 for each year from 2008 through 2010 and as of June 30, 2011 and:

a. Identify where they are physically located in each location served.

b. Separately identify the services Aventure supplies to the business customers residing in South Dakota and Iowa.

c. State whether Aventure offered or offers any of these business customers a share of its intercarrier compensation revenue.

d. Identify how many of these business customers are affiliates of Aventure, if any.

1-37 Please indicate whether Aventure's residential and business end user customers physically located in either Iowa or South Dakota utilize Aventure's long distance offering or whether they pick a specific long distance carrier.



- 1-38 Please identify the underlying long distance carrier(s) that Aventure utilizes to provide its domestic long distance service to its residential and business end user customers.
- 1-39 Please identify the rates paid by Aventure to its underlying long distance carrier(s) utilized to provide domestic long distance service to its residential and business end user customers.
- 1-40 Please provide a complete copy of each and every carrier interconnection, reciprocal compensation, or switched access rate agreement that is or has been in place between Aventure and any interexchange carrier, VoIP or wireless carrier from 2008 to date.
- 1-41 Produce all cost support both in South Dakota and Iowa that Aventure relies upon to support or justify the rates within its suspended intrastate switched access tariff.
- 1-42 Please produce all documents showing Aventure's switched access rate calculations and revenues from 2008 to the present in both Iowa and South Dakota.
- 1-43 Please produce summary CABs billing records for intrastate switched access service and interstate switched access service from 2008 to present in both South Dakota and Iowa.
- 1-44 Please provide a current list of every FCSC (by name and address) that Aventure serves or plans to serve in either South Dakota and Iowa.
- 1-45 Please produce a copy of every agreement in existence as of 2008 or which Aventure has entered with all its FCSCs from 2008 to present and any amendments thereto.
- 1-46 Please produce a copy of all bills or invoices for both Iowa and South Dakota local service Aventure rendered to every FCSC from 2008 to the present and proof of payment by each FCSC for such invoices. Please identify by month and year from 2008 through June 30, 2011 amounts paid to each FCSC of Aventure.
- 1-47 Please identify by month and year from 2008 through June 30, 2011 the number of switched traffic minutes of use attributable to each of the following categories of traffic in both Iowa and South Dakota: a) local, b) Aventure-branded intraLATA long distance, c) Aventure-branded intrastate interLATA long distance, d) Aventure-branded interstate domestic long distance, e) Aventure-branded international, e) intra-MTA wireless interconnection (Originating), f) intra-MTA wireless interconnection (Terminating), g) inter-MTA wireless interconnection (Originating), h) inter-MTA wireless interconnection (Terminating), i) intrastate intraLATA interexchange carrier (IXC) (Originating), j) intrastate intraLATA

**interexchange carrier IXC (Terminating), k) intrastate interLATA IXC (Originating), l) intrastate interLATA IXC (Terminating), m) interstate IXC (Originating), n) interstate IXC (Terminating).**

- 1-48 Please provide a description of the current or planned out-bound routing of traffic from Aventure's residential and business customers to a) incumbent local exchange carrier customers within the free local calling scope of Aventure's customers, b) non-local intraLATA points within Iowa and South Dakota, c) interLATA points within Iowa and South Dakota, d) interLATA points outside of Iowa and -South Dakota. For purposes of this question the description of "out-bound routing" should include but is not limited to identification of what facilities are used to transmit the originating call from the Aventure customer to the first point of switching, the first point of switching, all leased or owned transport, intermediate Aventure-owned switching, and identification of where traffic is handed off to third parties for transport and termination.
- 1-49 Please provide a description of the current or planned out-bound routing of traffic from Aventure's FCSCs to a) incumbent local exchange carrier customers within the free local calling scope of Aventure's customers, b) non-local intraLATA points within Iowa and South Dakota, c) interLATA points within Iowa and South Dakota, d) interLATA points outside of Iowa and South Dakota. For purposes of this question the description of "out-bound routing" should include but is not limited to identification of what facilities are used to transmit the originating call from the Aventure customer to the first point of switching, the first point of switching, all leased or owned transport, intermediate Aventure-owned switching, and identification of where traffic is handed off to third parties for transport and termination.
- 1-50 Please provide a description of the current or planned in-bound routing of traffic to a) Aventure's residential customers originated from within Iowa and South Dakota, b) Aventure's residential customers originated from outside of Iowa and South Dakota, c) Aventure's Free Calling Service Company (FCSC) partners originated from within South Dakota and Iowa, d) Aventure's Free Calling Service Company (FCSC) partners originated from outside of South Dakota and Iowa. For purposes of this question the description of "in-bound routing" should include but is not limited to identification of where traffic is handed off to Aventure's owned or leased facilities, what owned or leased facilities the traffic traverses, the points traffic is switched by switch name and location how calls are handed off to the customer from the final point of switching (line side, trunk side, voice grade path, BRI, PRI, DS1 or higher level) and what facilities are used to transmit the call to the customer.
- 1-51 For all long-term debt of Aventure, please identify the original loan amount, the stated interest rate, the term, the payment plan (*e.g.*, interest only, monthly, quarterly, etc.) and the loan amount remaining as of June 30, 2011.
- 1-52 For each lender to Aventure, please provide copies of the three most recent reports, statements, certifications, or other document required by and provided to

lenders describing the solvency of the firm and demonstrating the firm is or is not meeting its debt obligations.

- 1-53 Please produce a complete copy of Aventure's federal income tax returns for 2008 through 2010.
- 1-54 Please produce a complete copy of Aventure's Iowa income tax returns and South Dakota's gross receipt returns for 2008 through 2010.
- 1-55 Please produce a copy of each Federal Excise Tax return filed for 2008 through 2010.
- 1-56 Please provide a copy of each state and local sales tax form filed for 2008 through 2010 in both Iowa and South Dakota.
- 1-57 Please provide a copy of each PUC and IUB annual report filed from Aventure's inception to date.
- 1-58 Please provide a copy of each Department of Revenue annual report filed from Aventure's inception to date in both Iowa and South Dakota.
- 1-59 Please state the total amount of dividends declared and expected to be declared by Aventure and paid to its owners for each year from 2008 to present.
- 1-60 Please identify the total amounts paid by Aventure to its parent firm(s) by year from 2008 to present and year-to-date in 2011.
- 1-61 Please provide a copy of all current equipment vendor contracts.
- 1-62 Please itemize amounts paid by Aventure to its parent firm(s) by year from 2008 to present and year-to-date in 2011 identifying the dates of the transactions, the Aventure accounts charged, a description of the purpose of the payment, and the amount of each transaction.
- 1-63 Please itemize amounts paid by Aventure to non-employee suppliers for professional services for each year from 2008 to present and year-to-date in 2011 identifying the dates of the transactions, the Aventure accounts charged, a description of the purpose of the payment, and the amount of each transaction. Professional services include but are not limited to: accounting, auditing, non-employee board of director fees and related expenses, consulting, corporate image advertising, country club membership fees, industry association dues, legal expenses, lobbying, professional association dues, and public relations.**
- 1-64 Please indicate whether the asset lives and salvage values used by Aventure have been approved for use by any regulatory body and if so, please provide documentation supporting such approval.

- 1-65 Please provide the 2009, 2010 and 2011 monthly 800 Database Query demand separated between state and interstate jurisdictions.
- 1-66 Please provide copies of the text of all radio and television advertising placed by Aventure with any Iowa or South Dakota media outlet or agency during 2010 and 2011. To the extent available, please also produce copies of visuals or graphics used in such advertising.**
- 1-67 Please provide copies of all Iowa or South Dakota advertising placed by Aventure with any media outlet (newspaper, magazine, school yearbook, sports program, billboard, yellow pages, internet provider, etc.) or agency during 2010 and 2011.**
- 1-68 Section 3.1.1 of Aventure's suspended South Dakota Tariff No. 3 states that switched access service "is functionally equivalent to the switched access service provided by the incumbent local exchange company." Explain the basis for the statement that Aventure's switched access is functionally equivalent to the switched access service provided by the incumbent local exchange company.
- 1-69 Aventure's prior South Dakota switched access tariff defined an end user "Any individual, association, corporation, government agency or any other entity other than Interexchange Carrier which subscribes to intrastate service provided by an Exchange Carrier. Explain the reason as well as the basis for the change in definition in Aventure's suspended South Dakota Tariff No. 3 to the following: "An End User need not purchase any service provided by the Company and may include, but is not limited to, conference call providers, chat line providers, calling card providers, call center providers, help desk providers and residential and and/or business service subscribers."
- 1-70 Explain how a service provided to an end user who doesn't pay for service constitutes switched access service when the Commission's rules on switched access service specifically define an end user as "[a] customer of an intrastate telecommunications service that is not a carrier is an end user."
- 1-71 What percentage of Aventure end users in all locations that Aventure serves do not purchase or pay for service from Aventure?
- 1-72 Is there any difference between how the calls are routed to the end users who purchase or pay for service from Aventure and those that do not? If so, explain the difference.**
- 1-73 Does Aventure's service always deliver calls to all of its end users over a local loop? If not, explain how the calls are delivered to those end users not employing a local loop.**
- 1-74 Does Aventure have end user premises that are located in its central offices? If so, what percentage, based on both traffic volume and customer assigned numbers, of end user premises are located in Aventure's central offices?**

- 1-75 Does Aventure have end user premises that are located in other offices owned or leased by Aventure or its affiliates? If so, what percentage, based on both traffic volume and customer assigned numbers, of end user premises are located in Aventure or affiliate owned or leased space?**
- 1-76 Does Aventure bill end users whose premises are located in its central offices or other Aventure owned or controlled space differently from those end users whose premises are not located in such places herein described? If so, explain the difference.**
- 1-77 Does Aventure employ the same switching functions for its end users whose end user premises are located in Aventure's central office or other Aventure owned or controlled space as for its end users whose end user premises are not located in such places? If not, explain the difference.**
- 1-78 What is the basis for requiring the Customer to provide the projected PIU factor on an annual basis for originating and terminating minutes?
- 1-79 How many of Aventure's Customers currently provide the projected PIU factor on an annual basis for originating and terminating access minutes or have provided such information since 2008?
- 1-80 Explain why and provide all documentation relied upon to determine that a default PIU of 50% is reasonable.
- 1-81 Please provide and identify by carrier the PIU percentage for the four largest interexchange carriers (in terms of total minutes of use recorded by Aventure) assessed switch access charges by Aventure as of December 31 for each year from 2008 to 2010 and as of June 30, 2011.
- 1-82 Section 2.13.1 references termination charges. Provide the basis for, the amount of and an explanation of when termination charges apply for service purchased pursuant to the suspended tariff.**
- 1-83 Explain why under Section 2.24.2 (A) it is appropriate for Aventure to cancel service without any liability when an amount is being withheld pursuant to a legitimate dispute regarding the charge.**
- 1-84 Section 2.10.1 requires the customer to pay all charges for services and equipment furnished to the Customer for the transmission of calls via the Company. Does this section require Customers to pay for use of the free conference equipment for calls that are subject to the assessment of access charges to the Customer under the terms of the suspended tariff?
- 1-85 Explain how Aventure tariff Section 2.10.4 B which requires that a disputed charge be paid in full is consistent with the portion A.R.S.D Section 20:10:07:04 that only allows a telecommunications company to require the customer pay the undisputed charge.**



- 1-86 Explain how the Aventure tariff Section 2.10.4.B which states that failure to pay the disputed portion of a bill is a sufficient basis for the Company to deny the dispute is consistent with that portion A.R.S.D. 20:10:07 that requires an appropriate investigation and a report on that investigation to the customer.
- 1-87 Explain how the Aventure tariff Section 2.10.4 D which states that the Company's failure to respond to a notice of dispute within 60 days after receiving the dispute will result in rejection of the dispute is consistent with that portion of A.R.S.D. 20.10:07 which requires an appropriate investigation and a report on that investigation to the customer.
- 1-88 Explain how Aventure tariff Section 2.10.4 A which requires that bills are accurate and binding unless a written notice of dispute is received with 90 days of the billing is consistent with SDCL 15-2-13 which allows an action to be brought within six years after the cause of action arises.
- 1-89 Explain why it is reasonable in Section 2.10.5 of Aventure's tariff to require that in any action instituted by a Customer arising out of a Customers' refusal to make payment pursuant to the tariff the Customer will be liable for the payment of the Company's attorneys regardless of the outcome of the action.
- 1-90 Please describe the basis in your tariff for the definition of "constructive order" and the rationale on which it should be approved by the PUC. Please provide the basis for the definition itself and any case law or regulatory ruling that will allow for such a definition to be utilized in a tariff or any instance in which such language was utilized or approved either by a court of law or regulatory body.
- 1-91 Please describe the basis in your tariff for the definition of "access tandem or "tandem switch" and the rationale on which it should be approved by the PUC. Please provide the basis for the definitions themselves and any case law or regulatory ruling that will allow for such definitions to be utilized in a tariff or any instance in which such language was utilized or approved either by a court of law or regulatory body.

Respectfully submitted this 1st day of July, 2011.

Olinger, Lovald, McCahren & Reimers, P.C.

/s/ signed electronically

William M. Van Camp

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*Attorneys for AT&T Communications of the Midwest, Inc.*

## CERTIFICATE OF SERVICE

William M. Van Camp hereby certifies that on the 1st day of July, 2011, he served the foregoing AT & T's First Set of Discovery Requests to Aventure electronically with the Aventure's counsel of record with copies of the same to the following persons electronically:

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