

**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)	Docket No. TC11-087
within the Study Area of Midstate)	
Communications, Inc.)	

AFFIDAVIT OF TODD LUNDY IN COMPLIANCE WITH SDLC 15-6-37 (a) (2)

Todd L. Lundy, being duly sworn, states as follows:

1. I am employed by CenturyLink as Associate General Counsel, and as such, represent CenturyLink in the above-captioned docket.
2. I have in good faith conferred with opposing counsel, Mr. Scott Swier, in this docket in an effort of obtain the requested discovery without the need for Commission action; however, those efforts have been unsuccessful.
3. The attempts to resolve the discovery disputes with NAT's counsel are memorialized in email communications between counsel, marked as Exhibits 1, 2, 3, 5 and 6 attached to and described in more detail in CenturyLink's Motion to Compel. They include the following email communications:
 - Exhibit 1: Email from me to Mr. Swier, dated March 19, 2012.
 - Exhibit 2: Email from Mr. Swier to me, dated March 21, 2012.
 - Exhibit 3: Email from me to Mr. Swier, dated March 21, 2012.
 - Exhibit 5: Email from me to Mr. Swier, dated March 29, 2012.
 - Exhibit 6: Email from Mr. Swier to me, dated March 29, 2012.

Further, the affiant sayeth naught.

Dated this 2nd day of April, 2012.



Todd L. Lundy

SUBSCRIBED AND SWORN TO BEFORE ME on this 2nd day of April, 2012.

Dawn S Shaw

Notary Public

My Commission expires:

2/7/14

