

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

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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. )	

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**AFFIDAVIT OF TODD L. LUNDY IN SUPPORT OF CENTURYLINK'S OPPOSITION TO NAT'S  
MOTION FOR SUMMARY JUDGMENT**

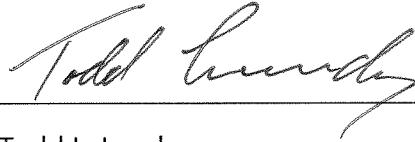
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Todd L. Lundy, being duly sworn, states as follows:

1. I am employed by CenturyLink as Associate General Counsel, and as such, represent CenturyLink in the above-captioned docket.
2. I submit this affidavit in conjunction with CenturyLink's Brief in Opposition to NAT's Motion for Summary Judgment, and in particular, whether NAT's Motion should be denied for its failure to provide discovery of information relevant to the issues in this docket.
3. On April 2, 2012, CenturyLink filed a Motion to Compel Discovery based upon NAT's failure to provide discovery. In short, NAT has failed to provide discovery addressing two categories of information. First, NAT failed to respond to requests seeking documents and information reviewed and analyzed by NAT's consultant in preparing his testimony, and two requests in particular focus upon any information he reviewed and analyzed relating to access stimulation and to the charges that NAT may invoice interexchange carriers such as CenturyLink. Second, NAT has failed to provide information relating to how NAT intends to make money from interexchange carriers such as CenturyLink through its admitted plans to engage in access stimulation.
4. The first category of information could be used in opposition to NAT's Motion for Summary Judgment because it is relevant to the credibility and sufficiency of the consultant's conclusions that NAT has met the statutory criteria for certification. The second category of

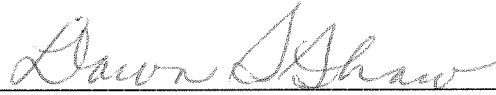
information could be relevant to whether NAT's intended use of its certificate would be in the public interest and whether any conditions should be placed upon its certificate.

Further, the affiant sayeth naught.



Todd L. Lundy

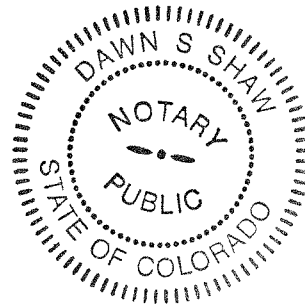
SUBSCRIBED AND SWORN to before me on this 11<sup>th</sup> day of April, 2012.



Notary Public

My Commission expires:

2/7/16



SEAL