

**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  
WITHIN THE STUDY AREA OF  
MIDSTATE COMMUNICATIONS, INC.

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Docket No. TC11-087

**NATIVE AMERICAN TELECOM, LLC'S  
MOTION TO COMPEL DISCOVERY**

COMES NOW Native American Telecom, LLC ("NAT"), through its counsel, and pursuant to SDCL 15-6-37, hereby moves the South Dakota Public Utilities Commission ("Commission") to issue an order compelling CenturyLink and Sprint Communications Company, L.P. ("Sprint") to respond fully to NAT's discovery requests.

NAT believes that discovery is wholly inappropriate in this certificate of authority matter. However, if the Commission allows discovery to proceed, NAT should be entitled to the same discovery information that CenturyLink and Sprint are seeking from NAT.

Pursuant to SDCL 15-6-37, NAT's counsel also certifies that he has, in good faith, conferred or attempted to confer with opposing counsel in an effort to obtain the requested discovery without the need for Commission action.

CenturyLink's and Sprint's responses to NAT's discovery requests

are included in this motion as Exhibits 1 and 2.

Dated this 2<sup>nd</sup> day of April, 2012.

SWIER LAW FIRM, PROF. LLC

*/s/ Scott R. Swier* \_\_\_\_\_

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and accurate copy of *NATIVE AMERICAN TELECOM, LLC'S MOTION TO COMPEL DISCOVERY* was delivered *via electronic mail* on this 2<sup>nd</sup> day of April, 2012, to the following parties:

*Service List (SDPUC TC 11-087)*

/s/ Scott R. Swier  
Scott R. Swier