

EXHIBIT
RGF-15

**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

Scott R. Swier

202 N. Main Street

P.O. Box 256

Avon, South Dakota 57315

Telephone: (605) 286-3218

Facsimile: (605) 286-3219

scott@swierlaw.com

Attorneys for NAT

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).*

INTERROGATORY NO. 5: In the federal court case between NAT and Sprint, Mr. Keith Williams testified on October 14, 2010 that calls to NAT numbers were switched by a Widevoice switch in Los Angeles, before being routed in IP back to NAT router in Ft. Thompson. October 14 Hearing Tr. Pp. 18-19. Is that true today? If so, where is that reflected in NAT's response to Staff Request 1-2. Regardless of switch location, provide detail (make, model, capacity, cost, date of purchase, ownership information, location) with respect to the switch now being used.

RESPONSE/OBJECTIONS: *Subject to and notwithstanding the aforementioned general objections, 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: *No, that is not true today.*

(LAX) – Los Angeles

Taqua

T8000

12 DS3

Leased

In-Service 9/1/2009

Leased

Los Angeles

IVS SBC

Dell Blade Server Chassis and Blades – approximately \$50,000 - hardware only.

GenBandC3 – approximately \$250,000 - hardware only.

GenbandG9

36 DS3

In-Service 6/1/2010

(SDN) – Sioux Falls

GenbandG9 – approximately \$128,000 – hardware only.

12 DS3 In-Service 11/30/2010

IVS SBC

Dell Blade Server Chassis and Blades – approximately \$30,000 – hardware only.

In-Service 6/18/2011

(FTT) - Fort Thompson

IVS SBC

Dell Blade Server Chassis and Blades – approximately \$30,000 – hardware only.

In-Service

GenbandG2 \$12,000

In-Service 4/20/2012

INTERROGATORY NO. 6: Describe the equipment to be used to provide NAT's Inbound Calling Service to those receiving it.

RESPONSE/OBJECTIONS: *Subject to and notwithstanding the aforementioned general objections, 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: *See "NAT's Response to Sprint's Interrogatory No. 6" (attached).*

INTERROGATORY NO. 22: Identify by name the members of the Tribal Utility Authority who voted to approve NAT's application for authority to provide service on the Reservation.

RESPONSE/OBJECTIONS: *Subject to and notwithstanding the aforementioned general objections, 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: *Brandon Sazue, Crow Creek Tribal Chairman, signed the "Order Granting Approval to Provide Telecommunications Service" on October 28, 2008.*

INTERROGATORY NO. 27: Who maintains NAT's financial records?

Where are NAT's financial records kept?

RESPONSE/OBJECTIONS: *Subject to and notwithstanding the aforementioned general objections, 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: *Carlos Cestero
4300 E. Pacific Coast Hwy., Long Beach, California 90804*

INTERROGATORY NO. 30: Identify the employees and officers of Free Conferencing who provide services to NAT or perform functions for NAT.

RESPONSE/OBJECTIONS: *Subject to and notwithstanding the aforementioned general objections, 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: *Jeff Holoubek, David Erickson, Tara Odenthal, Carlos Cestero, Hector DeLatore*

INTERROGATORY NO. 31: When did NAT first approach Free Conferencing to enter into a contract with NAT?

RESPONSE/OBJECTIONS: *Subject to and notwithstanding the aforementioned general objections, 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: *Approximately January 2009.*

INTERROGATORY NO. 43: Please provide a detailed diagram showing the call path through NAT-owned or controlled equipment for traffic terminating to any and all Conference Call Company-owned or controlled conference bridge equipment.

RESPONSE/OBJECTIONS: *Subject to and notwithstanding the aforementioned general objections, 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: *See "NAT's Response to Sprint's Interrogatory No. 43" (attached).*

INTERROGATORY NO. 44: Please provide a detailed diagram showing the call path through NAT-owned or controlled equipment for traffic terminating to a traditional residential or business end-user (non-Conference Call Company).

RESPONSE/OBJECTIONS: *Subject to and notwithstanding the aforementioned general objections, 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: *See "NAT's Response to Sprint's Interrogatory No. 44" (attached).*

DOCUMENT REQUEST NO. 7: Provide all general ledger journal entries or other accounting records of NAT that support NAT's balance sheets and profit and loss statements for 2009, 2010 and 2011.

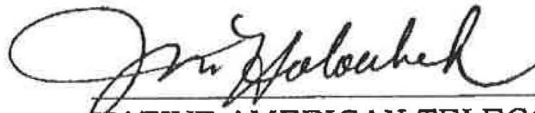
RESPONSE/OBJECTIONS: *Subject to and notwithstanding the aforementioned general objections, such information is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence in this Certificate for Authority matter.*

FIRST SUPPLEMENTAL RESPONSE/OBJECTIONS: *See "NAT's Response to Sprint's RFPD No. 7" (attached).*

VERIFICATION

I, *Jeff Holoubek*, state that I have first-hand knowledge of the matters set forth above and hereby verify that, to the best of my knowledge and belief, the allegations and statements contained herein are true and correct.

Dated this 16TH day of January, 2013.



NATIVE AMERICAN TELECOM, LLC

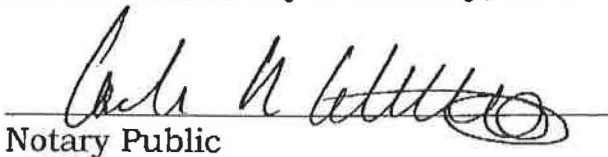
By: Jeff Holoubek

Its: Acting President

STATE OF CALIFORNIA)

COUNTY OF LOS ANGELES)

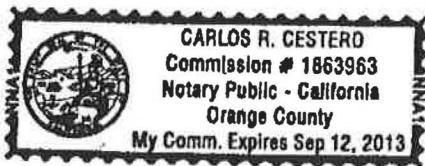
Subscribed and sworn to before me this 16TH day of January, 2013.



Notary Public

My Commission Expires: SEPTEMBER 12, 2013

(SEAL)



CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of *NATIVE AMERICAN TELECOM, LLC'S **FIRST SUPPLEMENTAL** OBJECTIONS AND RESPONSES TO SPRINT COMMUNICATIONS COMPANY L.P.'S DISCOVERY REQUESTS* was delivered *via United States Mail* on this 18th day of January, 2013, to the following parties:

Service List (SDPUC TC 11-087)

/s/ Scott R. Swier
Scott R. Swier

**NAT'S RESPONSE TO SPRINT'S
INTERROGATORY NO. 2**

SDPUC TC 10-026

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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

SECTION 4 - MISCELLANEOUS SERVICES AND CHARGES, (CONT'D)

4.1 End User Access Service

End User Access Service provides for the use of Company common lines by end users who obtain local exchange service from the Company under its general and/or local exchange tariffs.

4.1.1 Limitations

- A. A telephone number is not provided with End User Access.
- B. Directory listings are not included with End User Access.
- C. Intercept arrangements are not included with End User Access.

4.1.2 Rates

Monthly Recurring Charge, per line or Trunk (Except PRI)	\$ 6.45
Monthly Recurring Charge, per PRI Arrangement	\$32.25

Transmittal No. 5
Issued: August 8, 2011

Effective: August 23, 2011

Scott R. Swier, Attorney for Native American Telecom, LLC
P.O. Box 256
Avon, SD 57315

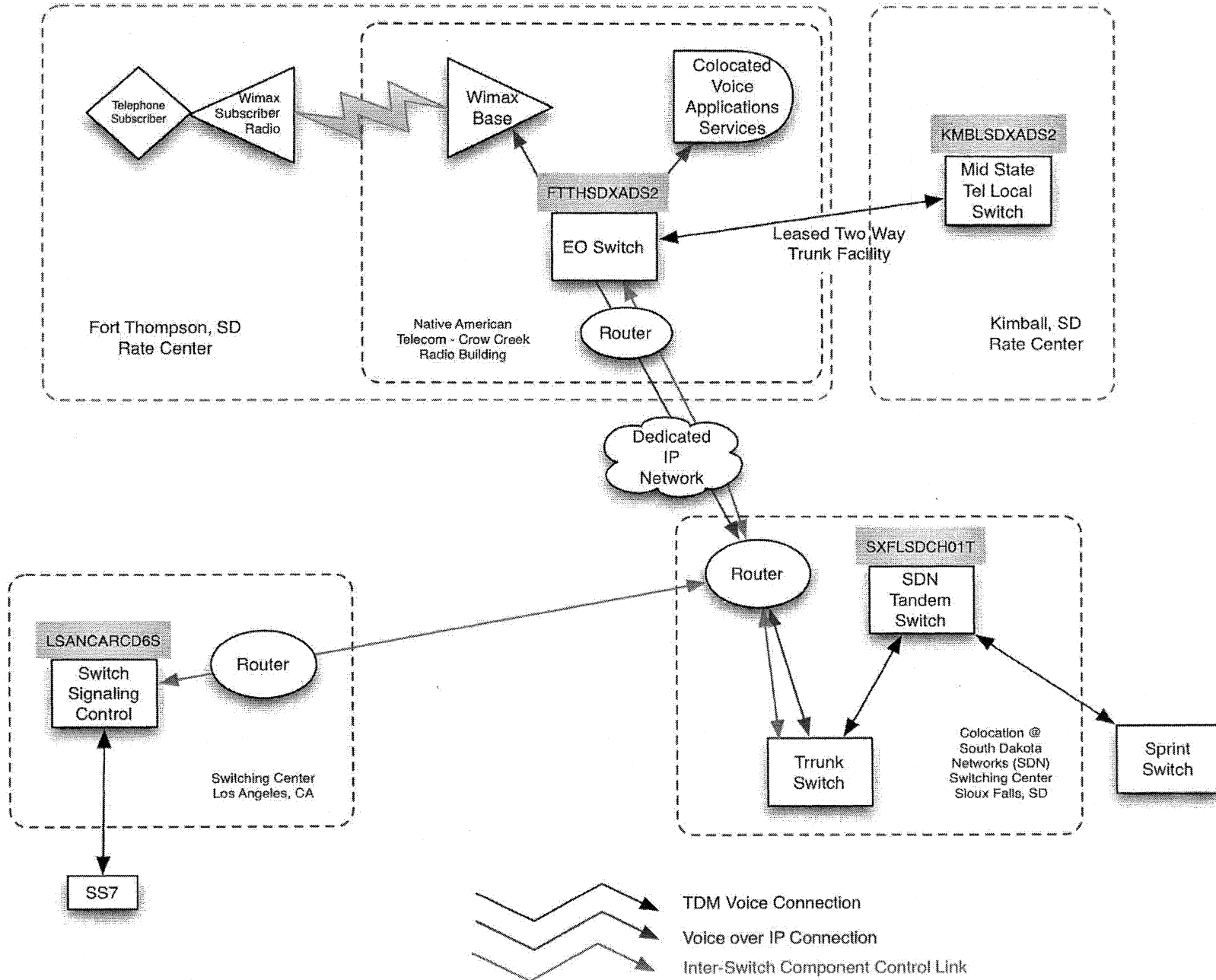
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**NAT'S RESPONSE TO SPRINT'S
INTERROGATORY NO. 6**

SDPUC TC 10-026

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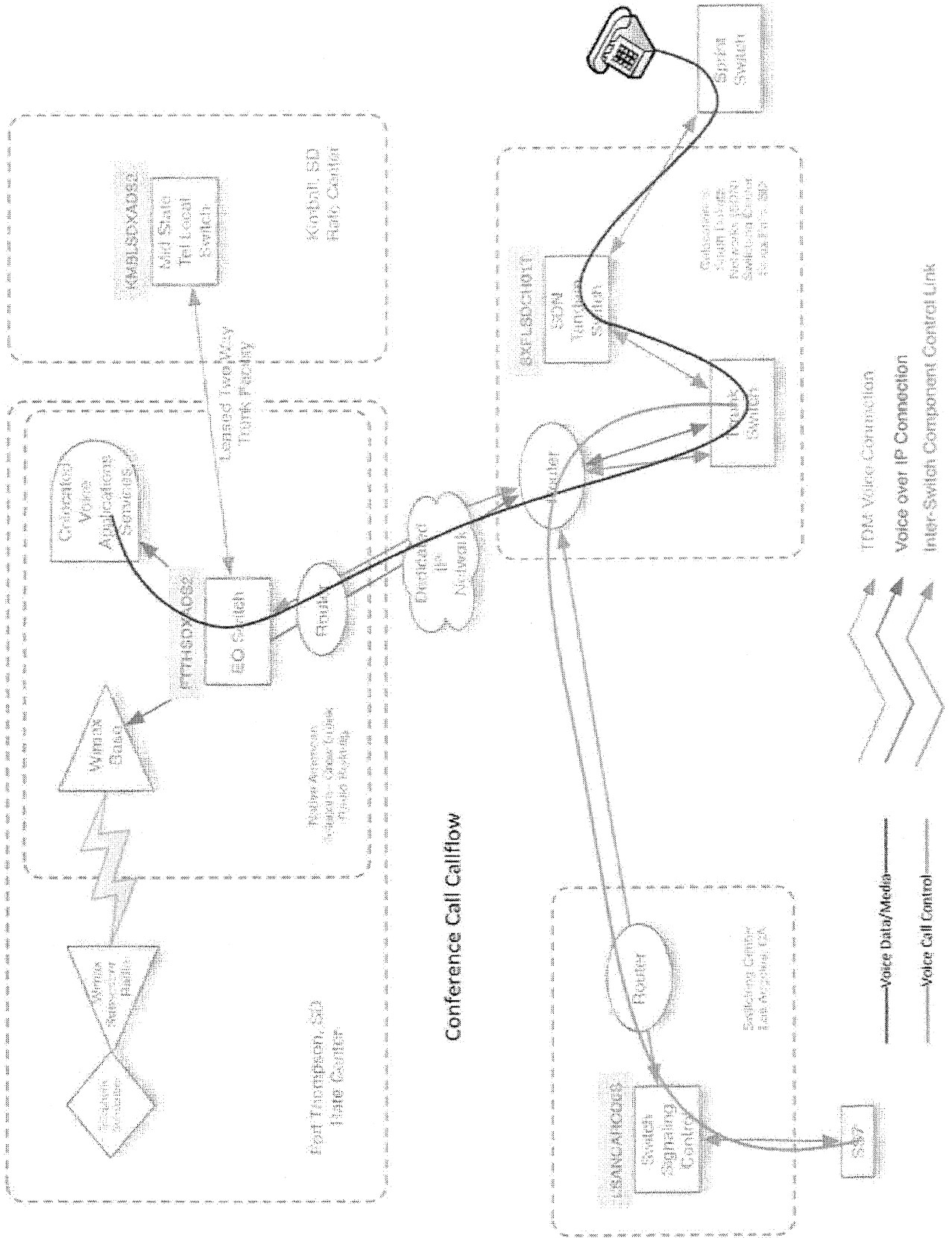
New (2q2012), - Native American Telecom - Crow Creek, Network Topology



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**NAT'S RESPONSE TO SPRINT'S
INTERROGATORY NO. 43**

SDPUC TC 10-026



**NAT'S RESPONSE TO SPRINT'S
INTERROGATORY NO. 44**

SDPUC TC 10-026

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