

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

**IN THE MATTER OF THE PETITION BY)
NORTH AMERICAN LOCAL LLC FOR)
RECLASSIFICATION AS A FACILITIES BASED) **TC23-046**
ELIGIBLE TELECOMMUNICATIONS CARRIER)
)**

**CORRECTED
MOTION TO COMPEL DISCOVERY AND SDCL 15-6-37(a)(2) CERTIFICATION**

Pursuant to ARSD 20:10:01:22.01 and SDCL 16-6-37(a), South Dakota Telecommunications Association (SDTA) hereby moves for an Order to compel North American Local, LLC (NAL) to respond to discovery requests. Specifically, SDTA moves for production of Discovery Request 2, 3, 4, 7. This Motion is supported by a corresponding brief.

Pursuant to SDCL 15-6-37(a) SDTA, through its counsel, Kara Semmler certifies that it did, in good faith attempt to confer with counsel for North American Local, LLC to secure the information and materials without Commission action. Such attempts were unsuccessful, and this Motion is necessary.

DATED this 22 day of January, 2024.

/s/ Kara Semmler

Kara Semmler
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