

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

IN THE MATTER OF THE COMPLAINT)
OF VENTURE COMMUNICATIONS) SD PUC DOCKET CT20-001
COOPERATIVE AGAINST AT&T)
MOBILITY)
)

**AT&T’s MOBILITY’S FIRST SET OF DISCOVERY REQUESTS
TO VENTURE COMMUNICATIONS COOPERATIVE**

AT&T Mobility, (“AT&T”) pursuant to SDCL 15-6-33,34 and the South Dakota Rules of Civil Procedure, and any acts amendatory thereof, hereby serves this First Set of Discovery Requests to Venture Communications Cooperative in the above-captioned proceeding.

INSTRUCTIONS

Each request must be answered within thirty (30) days of service pursuant to Commission order, with answers, under oath, to AT&T’s Attorney William M. Van Camp at the law office of Olinger, Lovald, McCahren & Van Camp, P.C., P. O Box 66, 117 E. Capitol, Pierre, South Dakota 57501, or such other place as may be agreed by the parties. These requests are continuing in nature and amended answers are to be served promptly when additional information is available to you, directly or indirectly, that would render incomplete, incorrect or misleading any answer previously provided.

Please repeat each data request and identify the individual(s) supplying the response. Where a request calls for a response in multiple parts, each part should be separated in the response so that the response is understandable and complete with respect to each part. If a request is not clearly understood or questions arise related to a request, promptly contact the undersigned counsel for clarification.

DEFINITIONS

1. “Venture” shall mean Venture Communications Cooperative and its predecessors and assigns, including without limitation, its officers, directors, employees, agents, consultants, attorneys, affiliates and subsidiaries.

2. “Customer” shall mean any and all natural persons, corporations, businesses, firms, companies, partnerships, unincorporated associations, governmental or public agencies, and others that purchase service for a fee from any Venture tariff, whether filed at the federal or state level.

3. “Describe” when used in reference to a document or other communication means to identify the type of document or communication, the date created or made, the people involved in communication, the present location or possession of the document or other recorded evidence of communication, and the substance content of the document or other communication.

4. “Describe” when used in reference to a factual situation or allegations means to state with particularity all facts known connected with, bearing upon, or relating in any way to the matters on which inquiry is made.

5. “Document,” or “documentation,” shall include, without limitation, any correspondence, writing, DVD, CD, graphic material, note, report, summary, manual, draft, calendar, log, photograph, plan, invoice, diary, ledger, journal, data or other recorded communication of any kind—regardless of medium and whether or not original or draft including additional writing thereon or attached thereto—that is responsive to the request.

6. “Identify, identity or identification” when used in herein shall mean provide the full name, title, business address and telephone number of any relevant individuals or, when used

in reference to documentation, shall mean to state the type of document (e.g., letter, memorandum, policy, circular, book, etc.) and the location of such documentation by business address.

7. "List," "explain," "specify," or "state" shall mean to set forth fully, in detail, and unambiguously each and every fact of which you, your company or your agents or representatives have knowledge which is relevant to the answer called for by the request.

8. "You" or "your" includes without limitation Venture Communications Cooperative and its predecessors, assigns, affiliates, subsidiaries, officers, agents, directors, employees, and consultants.

INTERROGATORIES AND REQUESTS FOR PRODUCTION

INTERROGATORY 1. Please provide your language in tariff or in a contract between AT&T, Venture and/or SDN that describes the service you are providing as alleged in your complaint to AT&T that entitles Venture to compensation.

INTERROGATORY 2. Is Venture compensated by SDN for services that SDN provides in support of AT&T's facilities.

INTERROGATORY 3. If the answer to Interrogatory 2 is yes, please describe how that compensation is determined. If it is by contract or agreement, please provide any such contract or agreement.

INTERROGATORY 4. If the answer to Interrogatory 2 is yes, please describe and document all such compensation for the years 2017 through present date.

Respectfully submitted this 15th day of April, 2021.

Olinger, Lovald, McCahren & Van Camp, P.C.



William M. Van Camp

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Pierre SD 57501

Telephone: (605)224-8851

Attorneys for AT&T Communications of the Midwest, Inc.

CERTIFICATE OF SERVICE

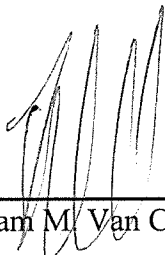
William M. Van Camp hereby certifies that on the 15th day of April, 2021, he served the foregoing AT & T's First Set of Discovery Requests to Venture Communications Cooperative electronically with the Venture Communications Cooperative's counsel of record with copies of the same to the following persons electronically:

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