

**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)
)

AFFIDAVIT OF FAY JANDREAU

STATE OF SOUTH DAKOTA)
 SS
COUNTY OF Hyde)

Fay Jandreau, Assistant General Manager of Venture Communications Cooperative, Inc. in support of Venture’s Opposition to New Cingular Wireless PCS, LLC dba AT&T Mobility’s (AT&T Mobility) Motion for Partial Summary Judgment, being first duly sworn, deposes and states as follows:

1. Although the facilities ordered by AT&T Mobility from Venture are in Venture’s end office switches, they would not be in the Venture end office switches if AT&T Mobility had not ordered them for the purpose of establishing a local presence in Venture’s service territory.
2. The facilities ordered by AT&T Mobility are not used for traffic terminated by Venture. They are used for traffic originated by Venture end users and terminated to AT&T Mobility end users.
3. The facilities ordered by AT&T Mobility are used to allow Venture end users to dial certain AT&T Mobility numbers as seven-digit local calls. The facilities allow Venture end users to dial AT&T Mobility numbers via seven-digits and to prevent Venture end users from being assessed a toll charge.
4. The facilities ordered by AT&T Mobility from Venture are different from the DS1 facilities AT&T Mobility purchases from SDN to transport traffic from Venture to AT&T Mobility. Venture provides a trunk group of 24 DS0 facilities to AT&T Mobility at three (3) Venture end office switches that create a local presence for AT&T in Venture’s end offices to allow Venture end users to call certain AT&T Mobility end users using 7-digit dialing. When ordering the 24 DS0’s from Venture, AT&T Mobility selected the AT&T Mobility NPA-NXX’s Venture end users would be able to dial with

seven-digit dialing. Venture multiplexes these DS0's up to a DS1 level and connects that DS1 to AT&T Mobility. AT&T Mobility uses a SDN DS1 facility for transport to the SDN office in Sioux Falls, which is cross-connected to AT&T's Omaha switch. AT&T Mobility ordered 2-way traffic capability on the subject DS0 trunks, but has not utilized this trunk in the terminating direction.

5. SDN does not pay Venture for the facilities purchased by AT&T Mobility from Venture.

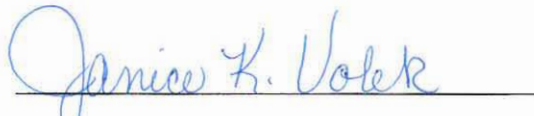
Further your affiant saith naught.

Dated this 18th day of June, 2021



Fay Jandreau

Subscribed to and sworn to before me this 18th day of June, 2021.



Notary Public

My Commission Expires: MARCH 24, 2022

SEAL

