

**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                                    )

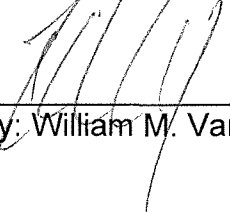
**AT&T MOBILITY’S STATEMENT OF  
UNDISPUTED MATERIAL FACTS**

COMES NOW, New Cingular Wireless PCS, LLC dba AT&T Mobility (Mobility), pursuant to ARSD 20:10:01:01:02 and SDCL 15-6-56(c) and for its Statement of Undisputed Material Facts in Support of its Motion for Partial Summary Judgment submits the following:

1. Venture Communications Cooperative (Venture) and Mobility’s predecessor in interest entered into an Interconnection Agreement in 2004. Van Camp affidavit @ 1.
2. Venture and Mobility entered into an amendment to their Interconnection Agreement to be effective as of July 1, 2012. Van Camp affidavit @ 2.
3. Mobility sends its end user’s originating calls to South Dakota Network (SDN) and SDN delivers the traffic to Venture for termination to Venture’s end users. Pre-filed direct testimony of Dan Le (Le Testimony) @ 50-52. Van Camp affidavit @ 3.
4. Mobility compensates SDN to act as the agent for Mobility in the delivery of traffic to Venture’s end users. Le Testimony @ 52-53. Van Camp affidavit @ 3.
5. Venture provides only the transporting of a call between its own end user and its end office switch and the hand off to the interconnection facility at its end office trunk port. Le Testimony @ 137-139. Van Camp affidavit @ 3.

Dated this 19<sup>th</sup> day of May, 2021

OLINGER, LOVALD, MCCAHERN &  
VAN CAMP, P.C.  
117 East Capitol Avenue  
PO Box 66  
Pierre, South Dakota 57501-0066  
(605) 224-8851 Phone  
(605) 224-8269 Fax  
[bvancamp@olingerlaw.net](mailto:bvancamp@olingerlaw.net)

  
By: William M. Van Camp

**CERTIFICATE OF SERVICE**


William M. Van Camp hereby certifies that on the 19<sup>th</sup> day of May, 2021, he served the foregoing AT & T Mobility's Statement of Undisputed Material Facts electronically with the Venture Communications Cooperative's counsel of record with copies of the same to the following persons electronically:

Ms. Patricia Van Gerpen  
Executive Director SD Public Utilities Commission  
500 E Capitol  
Pierre SD 57501  
[patty.vangerpen@state.sd.us](mailto:patty.vangerpen@state.sd.us)  
(605)773-3201- voice  
(605)773-6031 – fax

Ms. Amanda Reiss  
Staff Attorney SD Public Utilities Commission  
500 E Capitol  
Pierre SD 57501  
[amanda.reiss@state.sd.us](mailto:amanda.reiss@state.sd.us)  
(605)773-3201- voice  
(605)773-6031 – fax

Mr. Joseph Rezac  
Staff Analyst SD Public Utilities Commission  
500 E Capitol  
Pierre SD 57501  
(605)773-3201- voice  
(605)773-6031 – fax  
[joseph.rezac@state.sd.us](mailto:joseph.rezac@state.sd.us)

Darla Pollman Rogers  
Attorney at Law  
319 S. Coteau – PO Box 280  
Pierre, SD 57501  
[dprogers@riterlaw.com](mailto:dprogers@riterlaw.com)



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William M. Van Camp