

**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 WILLIAM M. VAN CAMP**

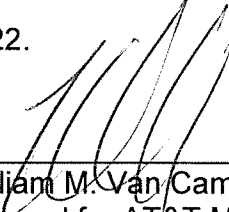
State of South Dakota        )  
  :ss  
County of Hughes            )

Affiant, William M. Van Camp, in support of the Objection to the Motion by Venture Communications Cooperative (“Venture”) to Amend Complaint and the Motion to Dismiss, upon oath, deposes and states as follows:

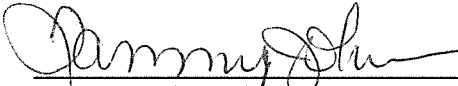
1. That he is counsel for AT&T Mobility (“AT&T”) in the pending matter before the Public Utilities Commission, SD PUC Docket CT20-001.
2. That he has knowledge of the facts of the matter.
3. That he had received and reviewed the proposed settlement agreement sent by Debbie Waldbaum of AT&T to Venture Counsel on October 8, 2020;
4. That he received a response from Venture to the October 8, 2020 settlement offer containing a counter proposal dated July 10, 2021.
5. That he responded to the July 10, 2021 settlement proposal made by Venture on August 4, 2021.
6. That he received a counter offer to the August 4, 2021 settlement proposal from Venture on August 27, 2021.
7. That he responded to the August 27, 2021 counter offer with another counter proposal on September 16, 2021.
8. That Affiant as counsel for AT&T Mobility has not received any response, counter offers or proposals from Venture to settle the dispute since September 16, 2021.
9. On December 16, 2021 counsel received an email from staff suggesting to the parties a new hearing date be set. Another email was sent by staff to the parties on February 7, 2022 requesting an update. Staff again in an email dated July 27, 2022 suggesting that a new hearing date be set.
10. On January 18, 2022 Affiant received correspondence from Venture suggesting AT&T conduct a traffic study to reduce the number of trunks it utilized and which are subject to the complaint. The correspondence from Counsel stated “...this is not an effort to settle the complaint docket, but it is an effort to stop the bleeding.”
11. On July 22nd, 2022, Affiant received an email from Venture’s counsel stating in part that a new hearing needed to be set as soon as possible.

12. Until the filing on the Motion to Amend on the 8<sup>th</sup> of November, 2022, no communications from Venture have been received in this dispute since an email dated July 27, 2022 dealing with the trunk disconnects.

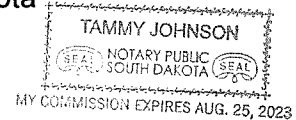
Dated this 18<sup>th</sup> day of November, 2022.

  
\_\_\_\_\_  
William M. Van Camp  
Counsel for AT&T Mobility

Subscribed and sworn to before me this 18<sup>th</sup> day of November, 2022.

  
\_\_\_\_\_  
Notary Public- South Dakota  
My commission expires:

(SEAL)



### CERTIFICATE OF SERVICE

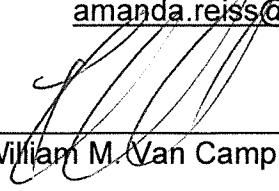
The undersigned hereby certifies that a true and correct copy of the foregoing in the above-entitled action was delivered by electronic mail this 18th day of November, 2022, to the following:

Ms. Patricia Van Gerpen  
Executive Director  
South Dakota Public Utilities Commission  
500 E. Capitol Avenue  
Pierre, SD 57501  
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South Dakota Public Utilities  
Commission  
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\_\_\_\_\_  
William M. Van Camp