

**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)
)

**COMPLAINANT’S RESPONSE TO RESPONDENT’S STATEMENT OF
UNDISPUTED MATERIAL FACTS**

COMES NOW, Complainant Venture Communications Cooperative, Inc. (“Venture”), by and through its attorney, Darla Pollman Rogers of Riter Rogers, LLP of Pierre, South Dakota and for its Response to Respondent’s Statement of Undisputed Material Facts as to which a genuine issue exists to be tried, states as follows:

1. Admits paragraphs 1-3.
2. Denies and disputes paragraph 4.

Paragraph 4 states:

Mobility compensates SDN to act as the agent for Mobility in the delivery of traffic to Venture’s end users. [internal citation omitted].¹

Venture disputes the preceding statement. The relevant portion of the parties’ Interconnection Agreement (“ICA”) does not, by its terms, create an agency arrangement.

Paragraph 5 states:

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 [internal citations omitted].²

¹ Statement of Undisputed Material Facts at p. 1.

² *Id.*

Venture affirmatively states that the preceding statement is not true, and is therefore disputed. The facilities are used to allow Venture's end users to dial certain AT&T M numbers as seven-digit local calls, and are only necessary for this purpose and for AT&T M to establish a local presence in Venture's service territory.

The facilities ordered by AT&T M from Venture are separate from the DS1 facilities AT&T M purchases from SDN to deliver traffic to Venture for termination. Venture provides a trunk group of 24 DS0 facilities to AT&T M at three (3) Venture end office switches that create a local presence for AT&T M in Venture's end offices to allow Venture end users to call certain AT&T M end users using 7-digit dialing. When ordering the 24 DS0's from Venture, AT&T M selected the AT&T M 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. Venture then "hands off" the DS1 to AT&T M. AT&T M uses a SDN DS1 facility for transport to the SDN office in Sioux Falls. The call eventually is transported to AT&T's Omaha switch.

Dated this 18th day of June, 2021.

RITER ROGERS, LLP

By 
Darla Pollman Rogers
Riter Rogers, LLP
319 S Coteau – PO Box 280
Pierre, SD 57501-0280
(605)224-5825
dprogers@riterlaw.com

Counsel to Venture Communications
Cooperative

CERTIFICATE OF SERVICE

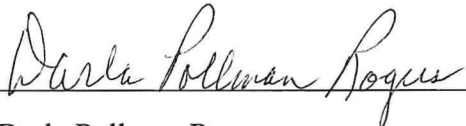
The undersigned hereby certifies that a true and correct copy of the foregoing in the above-entitled action was delivered by electronic mail this 18th day of June, 2021, to the following:

Ms. Patricia Van Gerpen
Executive Director
South Dakota Public Utilities Commission
500 E. Capitol Avenue
Pierre, SD 57501
Patty.VanGerpen@state.sd.us

Ms. Amanda Reiss
Staff Attorney
South Dakota Public Utilities Commission
500 E. Capitol Avenue
Pierre, SD 57501
Amanda.Reiss@state.sd.us

Mr. Joseph Rezac
Staff Analyst
South Dakota Public Utilities Commission
500 E. Capitol Avenue
Pierre, SD 57501
joseph.rezac@state.sd.us

AT&T Mobility
Mr. William M. Van Camp
Olinger Law Firm
117 E. Capitol Ave. – PO Box 66
Pierre, SD 57501
jbvancamp@olingerlaw.net



Darla Pollman Rogers

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