

**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)	
)	

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

COMES NOW, Venture Communications Cooperative (“Venture”), by and through its counsel of record, and responds to AT&T Mobility’s (“AT&T”) First Set of Discovery Requests:

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.

ANSWER: Section 3.1 of the Interconnection Agreement (“Agreement”); Section 5.0 of Appendix A to the Agreement; Venture’s pricing catalog; and the relevant Access Service Requests (“ASRs”) describe the service Venture provides to AT&T.

Copies of each were provided with the Pre-Filed Testimony of Mr. Fay Jandreau as Exhibits 2 (Agreement with Appendix A), 4 (Local Price Catalog), and 3 (Access Service Request), respectively.

As an example, at page one of Exhibit 3 of Mr. Jandreau’s Pre-Filed Testimony, the ASR clearly states in the “Remarks” section, “Establish a new 2B, 2W, SS7, DF, wireless TG with 1 B8zS/ESF T1s and 24 SS7 trunks at DS0.” These trunks are also referenced on page 4 of the ASR (not included in Exhibit 3 but attached hereto), in the TCIC field: “00001-00024.”

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

ANSWER: Venture is not compensated by SDN for the transport or termination of the relevant trunk groups.

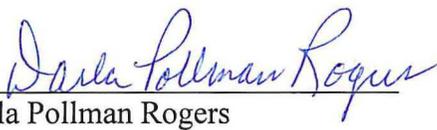
INTERROGATORY 3. If the answer to Interrogatory 2 is yes, please describe how that compensation is determined. If it is by contract or agreement, please provide any such contract or agreement.

ANSWER: N/A

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

ANSWER: N/A

Respectfully submitted this 21st day of May, 2021.

By 
Darla Pollman Rogers

Counsel to Venture Communications
Cooperative

CERTIFICATE OF SERVICE

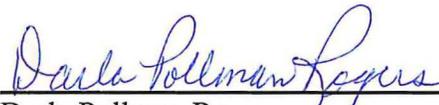
Darla Pollman Rogers certifies that on the 21st day of May, 2021, she served the foregoing Venture Communications Cooperative's Response to AT&T Mobility's First Set of Discovery Requests electronically to AT&T Mobility's counsel of record with copies of the same to the following persons electronically:

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