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December 29, 2006

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Via Electronic Mail

Mr. Talbot Wieczorek
Gunderson, Palmer, Goodsell & Nelson
PO Box 8045
Rapid City, SD 57709-8045

*Re: In the Matter of Sprint Communications Company L.P.'s Petition for Consolidated
Arbitration – TC06-175
Discovery Responses*

Dear Mr. Wieczorek:

Interstate Telecommunications Cooperative, Inc. (“ITC”) has reviewed the responses to discovery requests that were completed by Sprint Communications Company L.P. (“Sprint”). Based on its review, ITC believes that many of the responses do not comply with Sprint’s requirements under the applicable discovery rules. Although ITC reserves the right to compel discovery regarding each Sprint response that is deficient and otherwise disputes the sufficiency of each objection asserted by Sprint, ITC, by this letter, is requesting that Sprint supplement its answers to part of the discovery requests.

Additionally, this letter is sent pursuant to SDCL § 15-6-37(a) which provides for the parties to attempt to work out any discovery disputes before the dispute is brought to the attention of the South Dakota Public Utilities Commission.

To avoid the need for further action, ITC requests that the information and documents requested by this letter be provided by no later than 5:00 p.m. central time on January 3, 2007.

Verification

No verification of Sprint’s answers was provided as required by the applicable discovery rules. See SDCL § 15-6-33(a).

Request: Please provide an appropriate verification.

EXHIBIT B

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Interrogatory No. 7

Document Request No. 2

Document Request No. 3

Interrogatory No. 7 requested Sprint to identify all agreements between Sprint and MCC (as the term "MCC" is defined in the ITC discovery) and agreements that Sprint has with other companies in South Dakota. Document Request No. 2 and Document Request No. 3 requested production of these agreements and related documents. Sprint's refusal to identify and produce these agreements and documents does not comply with the requirements of the discovery rules. Additionally, Sprint has previously agreed to the protective order in this proceeding and Sprint can not now argue that the protective order is insufficient to justify the production of the agreements and documents that ITC has requested.

Request: Please identify and provide all relevant documents.

Interrogatory No. 14

Interrogatory No. 15

These interrogatories request the identity of the individuals who negotiated the business relationship between Sprint and MCC. Sprint's claim that it relies upon MCC as the pipeline by which "Sprint provides the functions identified above indirectly to the public through MCC" (Response to Interrogatory 4) (let alone other assertions within the Sprint Petition for Arbitration), makes the details of this relationship relevant to this proceeding and the identity of the individuals who negotiated this relations is clearly relevant information. Additionally, Sprint's additional objection to Interrogatory No. 15 is incorrect because the request seeks for the identification of the individuals that are within Sprint's knowledge. The request does not require Sprint to obtain information from MCC.

Request: Please provide the identity of the appropriate individuals.

Interrogatory No. 16

Interrogatory No. 16 was not limited to the state of South Dakota. ITC interprets Sprint's answer as meaning that there are no other agreements with any parties that provide for the same terms, conditions or pricing as the Sprint-MCC agreements.

Request: If this interpretation is incorrect, please provide all agreements.

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Interrogatory No. 17

Interrogatory No. 18

Related Document Requests

Interrogatory No. 17 and 18 are relevant to this proceeding in light of, among other claims, Sprint's claim that Sprint is entitled to interconnection for traffic originated by MCC. Sprint's objections are incorrect and the response provided by Sprint is insufficient.

Request: Please provide all agreements that do not provide for the same terms conditions or pricing as the Sprint-MCC Agreements.

Interrogatory No. 20

Document Request No. 5

The general description of the MCC-Sprint network provided in response to Interrogatory No. 20 does not include a description, including locations, of all switching and transport used to provide service to MCC customers. No objection was included by Sprint to this request. By way of example, the detailed information is relevant to understanding the potential interconnection scenarios of the networks involved in this proceeding.

Sprint's objection to Document Request No. 5 is not sustainable because the information is relevant to the interconnection of the networks in this proceeding. Additionally, any information alleged by Sprint to be confidential is subject to the protective order in this proceeding. Further, the response is not overly broad and unduly burdensome.

Request: Please provide the information requested and related documents.

Request for Admission 3

Sprint objects to this request as requiring a legal conclusion. This objection is incorrect. The request for admission is regarding a factual matter not a legal conclusion.

Request: Please admit or deny the request for admission

Document Request No. 6

Sprint's objections to Document Request 6 are without merit. The request only requires information and documents Sprint has regarding the listed proceedings. These documents may contain or lead to the discovery of relevant information. Consequently, the documents are valid and the documents must be produced by Sprint.

Request: Please produce all document requested in Document Request No. 6.

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ITC looks forward to receiving the full and complete information requested herein by 5:00 p.m. central time on January 3, 2007. Should you have any questions or require clarification of the requests set forth herein, please do not hesitate to contact me.

Sincerely,

CUTLER & DONAHOE, LLP

Meredith A. Moore

Counsel for

Interstate Telecommunications Cooperative, Inc.

cc: D. Browning
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