

# GUNDERSON, PALMER, GOODSSELL & NELSON, LLP

## ATTORNEYS AT LAW

J. CRISMAN PALMER  
G. VERNE GOODSSELL  
JAMES S. NELSON  
DANIEL E. ASHMORE  
TERENCE R. QUINN  
DONALD P. KNUDSEN  
PATRICK G. GOETZINGER  
TALBOT J. WIECZOREK  
JENNIFER K. TRUCANO  
DAVID E. LUST  
THOMAS E. SIMMONS

ASSURANT BUILDING  
440 MT. RUSHMORE ROAD  
POST OFFICE BOX 8045  
RAPID CITY, SOUTH DAKOTA 57709-8045  
TELEPHONE (605) 342-1078 • FAX (605) 342-0480  
www.gundersonpalmer.com

ATTORNEYS LICENSED TO PRACTICE IN  
SOUTH DAKOTA, NORTH DAKOTA, NEBRASKA  
COLORADO, CALIFORNIA, WYOMING & MINNESOTA

TERRI LEE WILLIAMS  
SARA FRANKENSTEIN  
AMY K. KOENIG  
JASON M. SMILEY  
SHANE C. PENFIELD  
JONATHAN M. OOSTRA  
MATTHEW E. NAASZ  
MATTHEW R. McGOVERN

WYNN A. GUNDERSON  
*Of Counsel*

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MAY 09 2007

OFFICE OF  
HEARING EXAMINERS

May 8, 2007

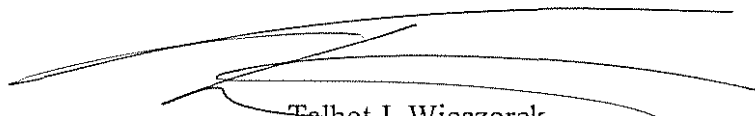
Julie Johnson  
Office of Hearing Examiners  
210 East 4<sup>th</sup> Street  
Pierre SD 57501

RE: IN THE MATTER OF THE PETITION OF VENTURE COMMUNICATIONS  
COOPERATIVE FOR SUSPENSION OR MODIFICATION OF LOCAL DIALING  
PARITY RECIPROCAL COMPENSATION OBLIGATIONS  
SDPUC Docket File Number TC 06-181 (PUC07-01)  
GPGN File No. 5925.060651

Dear Ms. Johnson:

Enclosed for filing please find the original Affidavit of Sean R. Simpson in support of Alltel's Response to Venture's Motion to Compel in the above-entitled matter. This document was filed on May 2, 2007, at which time a copy of the Affidavit was provided to you and all parties.

Sincerely,



Talbot J. Wieczorek

TJW:klw

Enclosure

c: w/o enclosure:

Patricia Van Gerpen via email  
Kara Van Bockern/Harlan Best/Rolayne Wiest via email  
Darla Rogers via email  
Mary Sisak/Ben Dickens via email  
Rich Coit via email  
Steve Rowell via email  
Sean Simpson via email  
Elizabeth Kohler via email

SOUTH DAKOTA

OFFICE OF HEARING EXAMINERS

In the Matter of the Petition of Venture )  
Communications Cooperative for suspension or )  
modification of local dialing parity and reciprocal )  
compensation obligations. )

PUC 7-01  
Docket No. TC06-181

AFFIDAVIT OF SEAN R. SIMPSON

STATE OF MINNESOTA )  
 ) SS  
COUNTY OF BLUE EARTH )


Sean R. Simpson, being first duly sworn, states as follows:

1. I am currently the Senior Counsel for Alltel Communications, Inc. ("Alltel").
2. I submit this Affidavit on behalf of Alltel in support of its Response to Venture Communications' Motion to Compel.
3. I was involved in and have personal knowledge with respect to the negotiations/discussions regarding the Scheduling Order in this proceeding as well as the discovery issues between the parties.
4. On April 2, 2007, the parties (Venture and Alltel) agreed to the Scheduling Order which included a deadline for submission of Motions to Compel by April 13, 2006.
5. Subsequent to the parties' agreement to the Scheduling Order, Commission staff requested that the final ruling be moved to late October. The parties' agreement to move the date for final ruling to November 1, 2007. The other dates previously agreed to remain the same.
6. Attached as Exhibit 1, is a true and correct copy of an email string beginning on April 2, 2007, that demonstrates the parties agreement on the Scheduling Order.
7. On April 3, 2007, Venture counsel sent a copy of the revised Scheduling Order to me for execution and ultimate filing with the OHE.
8. Local counsel Talbot Wieczorek executed the Scheduling Order on behalf of Alltel, and sent to Venture for filing with the OHE.
9. On April 9, 2007, I contacted counsel for Venture inquiring on whether or not it was more efficient to have the hearings on the Motion to Compel and Motion for Dismissal

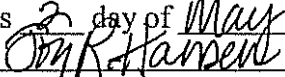
on one day rather than 2 days, as provided for in the agreed upon Scheduling Order. I did not revoke my prior agreement on the dates identified in the Scheduling Order. I simply inquired as to the need for one hearing date instead of two separate dates.

10. Consistent with the parties' agreement on the Scheduling Order, Venture served and filed its Response to the Alltel Motion to Dismiss on April 6, 2007.
11. At no point in time prior to the April 13, 2007, deadline for Motions to Compel, did Venture identify the specific discovery requests that it sought additional information on over the previously stated Alltel objections.
12. Venture did not identify the specific discovery requests it sought additional information on until April 14, 2007 – one day after the agreed upon deadline for the filing of a Motion to Compel.
13. Attached as Exhibit 2, is a true and correct copy of the email string on April 13, 2007, between myself and Venture counsel on the issue of adhering to the previously agreed upon Scheduling Order.
14. Prior to the Motion to Compel deadline of April 13, 2007, I made several inquiries on behalf of Alltel attempting to gain additional discovery responses from Venture. At no time during those conversations did Venture seek similar information with respect to the Alltel responses.

FURTHER YOUR AFFIANT SAITH NAUGHT.

  
Sean R. Simpson

Subscribed and sworn to before me  
this 2 day of May, 2007.

  
Notary Public

