

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
MARK J. CONNOT
JENNIFER K. TRUCANO
DAVID E. LUST

ASSURANT BUILDING
440 MT. RUSHMORE ROAD
POST OFFICE BOX 8045
RAPID CITY, SOUTH DAKOTA 57709-8045
TELEPHONE (605) 342-1078 • FAX (605) 342-9503
www.gundersonpalmer.com

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

RECEIVED

SEP 14 2006

SOUTH DAKOTA PUBLIC
UTILITIES COMMISSION

THOMAS E. SIMMONS
TERRI LEE WILLIAMS
PAMELA SNYDER-VARNS
SARA FRANKENSTEIN
AMY K. KOENIG
JASON M. SMILEY
SHANE C. PENFIELD
JONATHAN M. OOSTRA
WYNN A. GUNDERSON
Of Counsel

September 13, 2006

VIA NEXT DAY DELIVERY

Ms. Hillary Brady
Office of Hearing Examiners
210 East 4th Street
Pierre SD 57501

RE: In the Matter of the Petitions of Golden West companies for Arbitration Pursuant to the Telecommunications Act of 1996 to Resolve Issues relation to Interconnection with WWC License, L.L.C. - Arbitration consolidation SDPUC Docket File Numbers TC 06-036 thru TC 06-042 GPGN File No. 5925.060285 OHE File PUC 6-06

Dear Ms. Brady:

Enclosed you will find a Motion to Compel and accompanying brief. The brief explains the specific items we are seeking to compel. We initially attempted to clarify some of these issues with opposing counsel, but opposing counsel is of the position that any discussion on discovery issues is now untimely. As explained in the brief, we disagree with this analysis.

At this time, I propose we discuss this motion at the hearing set next Tuesday to hear the other pending motions. At that time, a consideration may be to schedule another time to fully argue the discovery motion either later next week or the first of the week following as exchange of initial testimony on the 20th may resolve questions surrounding some of the discovery requests. The requirements you have placed upon the parties to provide information in an unprotected format could answer some of the questions that were previously not fully responded to by the Golden West Companies.

If you need anything else, please let me know.

Sincerely,


Talbot J. Wieczorek

TJW:ckk

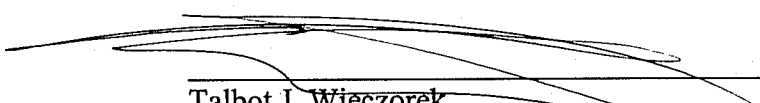
Enclosures

c: Clients (via email)
Meredith Moore (via email)
Paul Schudel (via email)
Rich Coit (via email)
Rolayne Wiest (via email)
Kara Vanbockern (via email) ✓

5. This motion is based on the brief accompanying the motion and the record in the above-entitled matter.

Dated this 13 day of September, 2006.

**Attorneys for Alltel Communications, Inc.
WWC License LLC:**



Talbot J. Wieczorek
GUNDERSON, PALMER, GOODSSELL
& NELSON, LLP
440 Mt. Rushmore Road, Fourth Floor
PO Box 8045
Rapid City SD 57709
605-342-1078
Fax: 605-342-0480

Stephen B. Rowell
Alltel Communications, Inc.
One Allied Drive
Little Rock, Arkansas 72202

CERTIFICATE OF SERVICE

I hereby certify that on the 13 day of September, 2006, I sent electronically and by first-class mail, postage prepaid, a true and correct copy **Western Wireless's MOTION TO COMPEL** to:

meredithm@cutlerlawfirm.com
Meredith Moore
Cutler & Donahoe, LLP
100 N Phillips Avenue - 9th Floor
Sioux Falls, SD 57104-6725


pschudel@woodsaitken.com
Paul M. Schudel
Woods & Aitken, LLP
301 S. 13th Street, Suite 500
Lincoln NE 68508

Kara.Vanbockern@state.sd.us
Kara Vanbockern
Staff Counsel
SDPUC
500 E. Capitol
Pierre SD 57501

Rolayne.wiest@state.sd.us
Rolayne Wiest
Staff Counsel
SDPUC
500 E. Capitol
Pierre SD 57501

Hillary Brady
Hearing Examiner
Office of the Hearing Examiners
210 East 4th Avenue
Pierre, SD 57501

Richcoit@sdtaonline.com
Rich Coit
SDTA
PO Box 57
320 E. Capitol Avenue
Pierre, SD 57501


Talbot J. Wiczorek