EXHIBIT 1 TO ALLTEL'S MOTION TO COMPEL - ALLIANCE

CONTAINS: ALLIANCE'S RELEVANT RESPONSES TO ALLTEL'S INTERROGATORIES AND REQUEST FOR PRODUCTION DATED FEBRUARY 29, 2008

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA

IN THE MATTER OF THE PETITION OF ALLIANCE COMMUNICATIONS COOPERATIVE, INC. FOR ARBITRATION PURSUANT TO THE TELECOMMUNICATIONS ACT OF 1996 TO RESOLVE ISSUES RELATING TO AN INTERCONNECTION AGREEMENT WITH ALLTEL, INC.	**DOCKET No. TC 07-111** **ALLIANCE COMMUNICATIONS COOPERATIVE, INC'S RESPONSES TO ALLTEL'S INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS**

FIRST SET OF INTERROGATORIES MADE BY ALLTEL

DR 1 For each Data Request, identify each person who assisted in the preparation of these responses, or who provided information for the purpose of preparing these responses.

RESPONSE: **These responses were prepared by Consortia Consulting, Vantage Point Solutions, General Manager Don Snyders, and undersigned counsel. Consortia Consulting assisted with those responses pertaining to the FLEC study. Vantage Point Solutions assisted with those responses pertaining to the InterMTA analysis and the FLEC study.**

DR 2 Provide 2007 minute of use data by Petitioner terminating CLLI code. State the type of traffic (i.e., intra-exchange voice traffic, intra-exchange dial-up ISP traffic, inter-exchange local and/or EAS, CMRS, intrastate toll, and interstate toll) whether the reported data are actual measured or estimated, and identify the records that support the responses. If 2007 usage is not available provide data for the most current period measured for each type of traffic.

(a) To the extent the MOU data provided differs from the MOU data used in Petitioner's cost study filed in this proceeding, explain and reconcile the differences.

(b) To the extent the MOU data provided herewith are actual, identify all usage terminating to an ISP trunk group.

(c) To the extent the MOU data are actual, identify all usage originated to Alltel and the trunk group that carries that traffic to Alltel.

(d) To the extent the MOU data provided is an estimate, explain the method by which ISP-bound traffic (i.e., dial-up internet traffic) estimate was derived.

proceeding. Without waiving these objections, see attached hereto as Exhibits D and E, Petitioner's Rural Utility Service Annual Reports for calendar years 2005 and 2006, respectively. The Rural Utility Service Annual Report for calendar year 2007 has not yet been completed.

DR 7 Confirm or deny if any Petitioner Affiliate is using any transport, transmission, or switch network element owned by Petitioner. If this statement is confirmed, identify the network elements and provide a copy of any cost study and any methodology used to allocate costs between the affiliated entities.

RESPONSE: The cable television affiliate is using fibers as identified in document "Alliance FLEC 00056-57" where these fibers are included in the non-transport fiber miles and thus excluded from the transport fiber miles.

DR 8 Confirm or deny if any Petitioner Affiliate or any entity not affiliated with Petitioner is occupying any building space, land or is utilizing any equipment or property owned or provided by Petitioner. If this statement is confirmed, identify the building, land, or power and provide a copy of any cost study and any methodology used to allocate costs between the affiliated entities.

RESPONSE: See Exhibit F attached hereto and incorporated herein by this reference.

DR 9 Identify all federal and state universal service support received for 2006 and 2007 for each study area in which Petitioner is providing service.

OBJECTION: Petitioner objects to this request on the basis that it seeks information which is not relevant to this proceeding. Petitioner further objects to this request on the basis that it is not reasonably calculated to lead to the discovery of relevant or admissible evidence. The requirements for the development of a FLEC study does not require consideration of Universal Service and therefore receipt of any such funding is irrelevant and immaterial to the issues identified in this arbitration proceeding.

DR 10 Provide copies of all documents upon which you rely to support your answers to all Data Requests.

RESPONSE: See exhibits attached hereto and identified herein.

DR 11 Provide complete cost models, cost schedules, work papers or other documentation underlying switching "price inputs" contained in the "Price Inputs" spreadsheet of each of your FLEC Model. This documentation should identify:

(a) Composition of Switch Processor prices in terms of quantities and unit investments for hardware and software. (Provide separately quantities and unit investments for standalone, host and remote switches.)

(b) Composition of Trunk Card prices in terms of quantities and unit investments for hardware and software, if any.

(c) Various "loading" factors used, such as engineering and installation factors, sales tax factors, miscellaneous construction cost factors and others.

(d) Composition of other switch investments, if any.

RESPONSE: See Exhibit G attached hereto and incorporated herein by this reference.

DR 12 Provide the sources of unit investments identified in DR11. These may include analyses of actual switch investments, analyses of vendor quotes, analyses based on vendor switch configuration models used for construction estimates or others.

RESPONSE: The source of the unit investment associated with the switch electronics estimates is based upon a composite of proposals received from switching electronics vendors for entities other than Alliance Communications. The pricing utilized is specific to projects of similar size and scope to the Alliance Communications network.

DR 13 Provide vendor or other documentation describing the engineering of "Switch Processor" hardware and software components in terms of the following:

(a) Whether the capacity (and costs) of hardware or software components are demand volume-sensitive or volume-insensitive.

(b) If volume-sensitive, the demand variable that causes exhaust of the component (switched line terminations, BH CCS, BH call attempts, BH milliseconds, *etc.*).

(c) The capacity (maximum and/or at engineered fill) of the component.

(d) And, the utilization of the component for each RLEC inherent in its FLEC Model.

Provide responses separately to the extent engineering parameters vary by switch type – standalone, host or remote switches.

OBJECTION AND RESPONSE: Petitioner objects to this request on the basis that it is overly broad and unduly burdensome. Petition further objects to subpart (d) of this request on the basis that it fails to properly define the terms and parameters necessary in order to adequately respond to this request. Without waiving these objections, Petitioner responds as follows:

cards, switch fabric cards, processor cards, power supplies, and cooling fan assemblies.

The Line Cost estimates for the Inter-Exchange Transport electronics include the OC-192 circuit interface cards and associated miscellaneous materials such as fiber patch cables. The purpose for these circuit interface cards is to facilitate the communication between adjacent SONET network elements.

The Tributary Cost estimates for the Inter-Exchange Transport electronics include any circuit interface cards required to provide the necessary tributary ports to add or drop the appropriate circuits at each respective location.

DR 20 Provide the complete cost models, cost schedules, work papers or other documentation underlying switched transport electronics by exchange and for the three equipment categories. This documentation should identify:

(a) Composition of the investment (by exchange and equipment category) in terms of equipment items (name and description), quantities and unit investments.

(b) Basis for equipment item quantities in terms of total demand and the engineering parameters used to determine quantities needed to serve total demand.

(c) Source of unit investments; *e.g.*, analyses of actual switched transport electronics installations, analyses of vendor quotes, analyses based on vendor configuration models or other.

RESPONSE: See Exhibit H attached hereto and incorporated herein by this reference.

DR 21 Confirm the following switched trunks (DS0s) are consistent with the total interoffice minutes of use, such that the resulting minutes of use/trunk is a valid measure of trunk usage. If not, provide consistent quantities.

RLEC	Switched Trunks	Total IO MOU	MOU/Trunk
Alliance Communications	8,655	112,337,303	12,979

RESPONSE: The switched trunks are consistent with the total interoffice minutes of use.

DR 22 Provide your current or most recent measure of interoffice trunk utilization (annual MOU/trunk) and the supporting work papers used to compute the measure.

OBJECTION: Petitioner objects to this request on the basis that it is overly broad and unduly burdensome. Petitioner further objects to this request on the basis that it seeks information which is not required in conformance with the development of a FLEC analysis. Petitioner further objects to the extent that such request improperly suggests that the Petitioner has a duty to continuously update its FLEC study as each input becomes more currently available.

DR 23 Provide a breakdown of the special circuit (paths) quantities for each RLEC by bandwidth as shown in the table below.

RLEC	Special Circuits (paths)	DS0	DS1	DS3	OC3	OC12	OC48
Alliance Communications	68						

OBJECTION AND RESPONSE: Petitioner objects to this request on the basis that it is overly broad and unduly burdensome. Petitioner further objects to this request on the basis that it seeks information which is not required in conformance with the development of a FLEC analysis. Without waiving these objections, the special circuit paths consist of 20 DS-0 paths, 47 DS-1 paths, and 1 DS-3 path.

DR 24 For each special circuit bandwidth, describe the proportion of OC-192 equipment capacity consumed by one circuit of each bandwidth. Provide capacity consumption separately for common equipment and plug-ins. (For example, a DS0 special circuit may consume 1/(24 X % engineering fill) of a DS1, a DS1 may consume 1/(84 X % engineering fill) of an OC3 plug-in; and, an OC3 plug-in may require one slot on the OC-192 common equipment. Likewise, an OC3 special circuit may require one OC3 plug-in and consume one slot of common equipment.)

OBJECTION: Petitioner objects to this request on the basis that it seeks information which is neither relevant nor reasonably calculated to lead to the discovery of relevant or admissible evidence. Petitioner further objects to this request on the basis that it seeks information which is not related to the FLEC study used in connection with this proceeding.

RESPONSE: See **Exhibit I attached hereto and incorporated herein by this reference.**

DR 29 Indicate whether you share cable structures (trenches, conduit, poles) with other utilities, telecommunications carriers or affiliates.

RESPONSE: **Interoffice cable structures are not shared with other utilities, telecommunications carriers or affiliates.**

DR 30 Indicate whether multiple cables (metallic or non-metallic) share your cable structures.

RESPONSE: **Multiple cables are not included in the cable structures.**

DR 31 Indicate whether a portion of your cable structures costs was allocated to users or uses other than interoffice cable in developing the urban and rural cable investments per foot. For example, does the $13.72/foot urban cable investment for Alliance Communications include all or only a portion of structures costs? (This allocation is distinct from the allocation of interoffice cable costs among transport, CATV, special, *etc.* based on fiber usage.)

RESPONSE: **No.**

DR 32 Provide cable investments per foot (urban and rural) for 12- and 24-fiber buried fiber cables, similar to the 48-fiber cable (BFO48) investments per foot reflected in your FLEC Models.

OBJECTION: **Petitioner objects to this request on the basis that it seeks information which is neither relevant to this proceeding nor is it likely to lead to the discovery of relevant or admissible evidence. Petitioner further objects to this request to the extent that it seeks information that is equally available to Alltel and the burden on Alltel to obtain the requested information is no greater than the burden on Petitioner.**

DR 33 In computing the % of fiber-miles in service for transport (vs. non-transport), provide the rationale for not including the fiber-miles used by digital loop carrier (DLC) in the total fiber-miles in service (*i.e.*, the denominator or total demand for fiber-miles)?

RESPONSE: **The forward looking engineering design does not include DLC fibers in the interoffice transport plant.**

DR 34 Provide the current or most recent average quantity of trunks or DS0 circuits per DS1. Provide source data and supporting calculations.

OBJECTION: Petitioner objects to this request on the basis that it seeks information which is neither relevant to this proceeding nor reasonably calculated to lead to the discovery of relevant or admissible evidence. This information is not required for the development of an appropriate FLEC model.

DR 35 Provide the current or most recent average quantity of switched lines per common transport trunk or DS0 circuit.

OBJECTION: Petitioner objects to this request on the basis that it seeks information which is neither relevant to this proceeding nor reasonably calculated to lead to the discovery of relevant or admissible evidence. This information is not required for the development of an appropriate FLEC model.

DR 36 Your "Fiber Table" (Alliance FLEC:00056) indicates the RLEC has 120.17 miles of fiber cable. Why does the 159.35 miles of fiber cable reflected in the Alliance FLEC Model substantially exceed actual cable length?

OBJECTION AND RESPONSE: Petitioner objects to this request on the basis that it seeks information which is neither relevant to this proceeding nor reasonably likely to lead to the discovery of relevant or admissible information. Without waiving this objection, the FLEC study conducted for Petitioner, pursuant to the instruction of the South Dakota Public Utilities Commission and standard industry practice, is based upon the use of ring technology. In preparing the FLEC model in this case, the most probable, efficient and direct route utilizing ring technology was used in order to develop the forward looking costs provided to Alltel.

DR 37 Your OSP Transport Detail" (Alliance FLEC:00005) indicates 58,100 feet of urban fiber cable for the Sioux Falls cable route. Confirm that this eleven miles of cable is (A) entirely owned by you and (B) entirely cable of the same type (material, structures, *etc.*) as other "urban" cable costing $13.72/foot.

RESPONSE: The FLEC model estimated a total of 58,100 feet of OSP town construction would be required within the city of Sioux Falls.

(a) For the purposes of this FLEC model, it was assumed that Alliance Communications would construct and own 100 percent of the fiber optic cable facilities shown.

(b) For the purposes of the FLEC model, it was assumed that the fiber optic cable type, fiber optic cable size, and construction methodologies for Sioux Falls would be comparable to all other OSP town construction included in the FLEC model.