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June 8, 2009

E-FILING

Ms. Patricia Van Gerpen
South Dakota Public Utilities Commission
Capitol Building, 1st Floor
500 East Capitol Avenue
Pierre SD 57501-5070

RE: Alltel – Alliance Arbitration: In the Matter of Dockets TC07-112, TC07-114, TC07-115
and TC07-116
GPGN File No. 05925.0042

Dear Ms. Van Gerpen:

Enclosed for filing please find Alltel Communication, LLC's Motion to Compel and Brief in Support of Motion to Compel in the above-entitled arbitration matters. Opposing counsel has been served electronically.

If you have any questions, please call me.

Sincerely,



Talbot J. Wieczorek

TJW:klw

Enclosures

c: Meredith Moore via email
Bob Knadle via email
Karen Cremer via email
Clients

BEFORE THE STATE OF SOUTH DAKOTA

PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE PETITIONS OF)	DOCKET NOS:
)	
MCCOOK COOPERATIVE TELEPHONE COMPANY,)	TC07-112
KENNEBEC TELEPHONE COMPANY,)	TC07-114
SANTEL COMMUNICATIONS COOPERATIVE, INC., AND)	TC07-115
WEST RIVER COOPERATIVE TELEPHONE COMPANY)	TC07-116
FOR ARBITRATION PURSUANT TO THE)	
TELECOMMUNICATIONS ACT OF 1996 TO RESOLVE)	
ISSUES RELATING TO AN INTERCONNECTION)	
AGREEMENT WITH ALLTEL COMMUNICATIONS, LLC)	

ALLTEL'S MOTION TO COMPEL

COMES NOW, the above-named Alltel Communications, LLC ("Alltel"), by and through its counsel of record, Talbot J. Wiczorek of Gunderson, Palmer, Nelson & Ashmore, LLP, and hereby files this Motion to Compel discovery from the above-named companies: McCook Cooperative Telephone Company, ("McCook"), Kennebec Telephone Company, ("Kennebec"), Santel Communications Cooperative, Inc., ("Santel") and West River Cooperative Telephone Company ("West River") or hereinafter known collectively as "the Companies," requiring the Companies completely answer interrogatories propounded to Alltel as part of discovery. This motion is based on the following reasons:

1. Alltel served written interrogatories on the Companies as part of its original action. Upon the Companies being required to update their traffic studies, the Companies supplemented the discovery but the Companies failed to provide information that was relevant and responsive to the questions. The Companies have failed to answer some of the interrogatories or provided incomplete answers;

2. Some of the interrogatories served on the Companies were objected to and the objections are without merit;

3. The specific interrogatories Alltel is seeking to compel answers on are outlined in the attached brief and the analysis of why the information is relevant and discoverable is set forth;

4. This motion is timely as there has been no deadline set for the filing of motions;
and

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

Dated this 8th day of June, 2009.



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ATTORNEYS FOR ALLTEL COMMUNICATIONS,
LLC

CERTIFICATE OF SERVICE

I hereby certify that on the 8th day of June, 2009, I sent electronically a true and correct copy of **ALLTEL'S MOTION TO COMPEL** to:

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