

# **EXHIBIT A**

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA**

<b>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.</b>	<p style="text-align:center"><b>DOCKET No. TC 07-111</b></p> <p style="text-align:center"><b>ALLTEL RESPONSE TO INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS (FIRST SET)</b></p>
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In accordance with the Commission's Procedural Order in the above-referenced docket, Alltel Communications, LLC ("Alltel") hereby provides its Responses to the Interrogatories and Requests for Production of Documents (First Set) from Petitioner.

**ALLTEL'S RESPONSES TO INTERROGATORIES**

1. State each and every respect in which Alltel contends in ¶ 16 of its Response that Petitioner's proposed reciprocal compensation rate as set forth in Appendix A of the Petition does not "represent the forward-looking economic cost per unit for call termination as required under the Act."

**RESPONSE:** Based upon information and belief regarding the configuration of the Petitioner's network as well as usage patterns and costs of similar situated Incumbent Local Exchange Carriers ("ILECs"), Alltel believes the proposed compensation rate does not represent the forward-looking economic cost per unit for call termination. Alltel is currently reviewing the cost models provided by Petitioner and reserves the right to further comment on the issue of the forward-looking economic cost per unit for call termination based upon its review and analysis of such cost studies as well as the supporting documentation provided and the remainder of the discovery information gathered in this proceeding as well as any other publicly available or independently developed information relevant to the issue of the forward-looking economic cost per unit for call termination.

2. Identify by month the total intraMTA MOU originated on Petitioner's network and terminated on Alltel's network from January 1, 2007 through November 20, 2007.

**RESPONSE:** Alltel does not currently gather or otherwise have possession of the requested information.

3. Identify by month the total interMTA MOU originated on Petitioner's network and terminated on Alltel's network from January 1, 2007 through May 31, 2006.

**RESPONSE:** Alltel does not currently gather or otherwise have possession of the requested information.

4. State whether Alltel has or will conduct a forward looking economic cost study for the purpose of establishing asymmetrical rates for transport and termination of traffic terminated to Alltel's network from the Petitioner's network, and if so, identify the rate(s) proposed by Alltel.

**RESPONSE:** Alltel as the responding non-incumbent wireless carrier does not have the obligation or evidentiary burden under the Act to conduct such studies within this proceeding to justify the proposed rate by the Petitioner.

5. Identify with specificity the supporting basis for Alltel's statement in ¶ 17 of its Response that "Petitioner should be required to compensate Alltel for its originated InterMTA traffic just as Alltel would compensate Petitioner for Alltel originated InterMTA traffic."

**RESPONSE:** Pursuant to accepted industry practice and consistent with the underlying principles of the reciprocal nature of originated and exchanged traffic, Alltel believes it is equitable and appropriate for originating carriers to compensate terminating carriers for the exchange of certain traffic including InterMTA traffic.

6. Identify with specificity the supporting basis for Alltel's statement in ¶ 17 of its Response that "the InterMTA use factors as proposed by Petitioner and the corresponding access rate for such InterMTA traffic is not supported or otherwise appropriate."

**RESPONSE:** Based upon information and belief regarding traffic or other usage patterns of Alltel and Petitioner generally, as well as similarly situated ILECs, Alltel believes the proposed factors are not supported. Alltel has not yet been afforded the requested traffic study or methodology that was used to develop the InterMTA use factor as alleged by Petitioner and Alltel reserves the right to further comment on the issue of InterMTA factors and corresponding rates based upon its review and analysis of any forthcoming studies as well as any supporting documentation provided and the remainder of the discovery information gathered in this proceeding as well as any other publicly available or independently developed information relevant to the issue of the InterMTA factors and rates.

7. Identify with specificity the supporting basis for Alltel's statement in ¶ 17 of its Response that "Petitioner's proposal on use of interstate versus intrastate access rates for such InterMTA traffic is also unsupported."

**RESPONSE:** Determination of a rate applicable to InterMTA traffic is typically negotiated among the parties and may or may not include statutory or regulatory preference. Alltel believes that given all current facts and circumstances use and application method of Petitioner access rates is an open issue in this matter. Alltel reserves the right to further comment on the issue of InterMTA factors and corresponding rates based upon its review and analysis of any forthcoming studies as well as any supporting documentation provided and the remainder of the discovery information gathered in this proceeding as well as any other publicly available or independently developed information relevant to the issue of the InterMTA factors and rates.

8. Identify with specificity the InterMTA factor that Alltel proposes to use for the measurement of InterMTA traffic. Provide any and all data that supports Alltel's proposed factor.

**RESPONSE:** Alltel, as the responding party without any burden of proof obligation has not yet developed or proposed an appropriate factor for measurement of InterMTA traffic. Alltel has not yet been afforded the requested traffic study or methodology that was used to develop the InterMTA use factor as alleged by Petitioner and Alltel reserves the right to further comment on the issue of InterMTA factors and corresponding rates based upon its review and analysis of any forthcoming studies as well as any supporting documentation provided and the remainder of the discovery information gathered in this proceeding as well as any other publicly available or independently developed information relevant to the issue of the InterMTA factors and rates.

9. Identify any terminating access tariff or any other publicly available price or rate list that sets forth rates or charges that Alltel claims to be entitled to bill for the termination of InterMTA traffic on Western Wireless' network.

**RESPONSE:** See response to Interrogatory 7.

10. Identify the reciprocal compensation rates provided in negotiated or arbitrated interconnection agreements currently in effect between Alltel and any ILEC in South Dakota.

**RESPONSE:** Please see attached.

11. Describe in detail all business criteria or other factors that Alltel considers in determining whether to request direct interconnection with a rural ILEC's network or indirect interconnection with a rural ILEC's network via a third party access tandem provider, and the use made of such factors in connection with Alltel's determination of the type of interconnection to be requested.

**RESPONSE:** Alltel considers a variety of economic, cost and network configuration factors depending on the individual facts and circumstances of each network request evaluation. However the primary criteria involves a comparison of the cost to hire a transit provider on a

variable cost basis versus leasing fixed cost facilities or the fixed cost of building dedicated facilities.

### **RESPONSES TO REQUESTS FOR PRODUCTION OF DOCUMENTS**

1. Produce a copy of any cost study, prepared by or on behalf of Alltel that you intend to use in connection with your evaluation of re-computation of the Petitioner's reciprocal compensation rates.

**RESPONSE:** Alltel does not currently possess such information but does reserves its right to develop and use information at a later time if it deems it necessary in order to refute the inflated compensation rates proposed by Petitioner.

2. Produce all documentation, including workpapers, notes, purchase contracts, planning documents, and the like, used or referred to by Alltel or your consultants in determining all inputs to any cost model relied on by Alltel in your evaluation or re-computation of the reciprocal compensation rate proposed by Petitioner.

**RESPONSE:** Alltel will produce such information, if any, as appropriate in connection with the pre-filed testimony of its witnesses.

3. Produce all records that reflect traffic MOU originated by Alltel customers that terminate to Petitioner's network by exchange and by month from January 1, 2007 through November 30, 2007, and thereafter as such records become available.

**RESPONSE:** Please see attached.

4. Produce maps or other documentation showing with specificity the physical location of each Alltel mobile switching center located in South Dakota and each Alltel cell site located within the serving areas of the Alltel, and illustrate the location of such cell sites in relationship to the MTA boundaries.

**RESPONSE:** Please see attached.

5. Produce any forward-looking economic costs study prepared by or for Alltel during the past three (3) years to establish a reciprocal compensation rate for the transport and termination of traffic on Alltel's network.

**RESPONSE:** Alltel does not currently gather or otherwise have possession of the requested information.

6. Produce all documentation, including workpapers, notes, purchase contracts, planning documents, and the like, used or referred to in determining all inputs to any cost model or cost study relied on by Alltel in this proceeding.

**RESPONSE:** Alltel does not currently gather or otherwise have possession of the requested information.

7. Produce all documents containing information relating to your response to Interrogatory 2 above.

**RESPONSE:** Alltel does not currently gather or otherwise have possession of the requested information above.

8. Produce all documents containing information relating to your response to Interrogatory 3 above.

**RESPONSE:** Alltel does not currently gather or otherwise have possession of the requested information above.

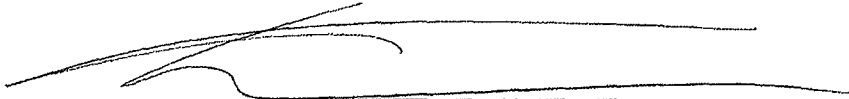
9. Produce all documents containing information relating to your response to Interrogatory 4 above.

**RESPONSE:** None. Please see Response to Interrogatory No. 4 above for further information.

10. Produce copies of any and all documents (i) referenced in Alltel's responses to Interrogatories 1 through 11 above, or (ii) that were referred to or used in any way by Alltel in formulating your responses to Interrogatories 1 through 11 above that have not already been produced to Documents Requests 1 through 10.

**RESPONSE:** Please see attached.

Dated this 18th day of January, 2008.



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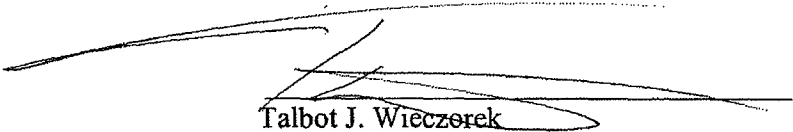
**CERTIFICATE OF SERVICE**

I hereby certify that on the 8 day of January, 2008, a true and correct copy of **Alltel Communication, Inc.'s RESPONSE TO ALLIANCE INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS (FIRST SET)**, was sent electronically to:

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