EXHIBIT 1 TO ALLTEL'S MOTION TO COMPEL – WEST RIVER

CONTAINS: 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 WEST RIVER COOPERATIVE TELPHONE COMPANY FOR ARBITRATION PURSUANT TO THE TELECOMMUNICATIONS ACT OF 1996 TO RESOLVE ISSUES RELATING TO AN INTERCONNECTION AGREEMENT WITH ALLTEL, INC.	**DOCKET No. TC 07-116** **WEST RIVER COOPERATIVE TELEPHONE COMPANY'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 Jerry Reisenauer, 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 your 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.

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 West River Cooperative Telephone Company. The pricing utilized is specific to projects of similar size and scope to the West River Cooperative Telephone Company network.**

RESPONSE: **The "Inter-Exchange Transport Costs" table provides a breakdown of transport electronics investment estimates by location and divides the estimates into three categories including Base Cost, Line Cost, and Tributary Cost. The locations listed on this table include the West River Cooperative Telephone Company exchanges, as well as optical regeneration sites required due to the distance between central office locations. In addition, estimates for lightwave transport electronics terminals necessary to connect to their Access Tandem provider were included.**

DR 19 Describe these equipment categories – base, line and tributary – in terms of the function of the category and the types of equipment included in the category (racks, shelves, power, wiring, plug-ins by bandwidth, *etc.*).

RESPONSE: **For the "Inter-Exchange Transport" electronics, the cost estimates for this equipment were divided into three categories: Base Cost, Line Cost, and Tributary Cost. The Base Cost estimates for the Inter-Exchange Transport electronics included "common" components for a SONET network element. These base costs may include, but are not limited to, items such as the SONET equipment chassis, timing and synchronization 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 that 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
West River	1,824	53,117,890	29,122

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 by bandwidth as shown in the table below.

RLEC	Special Circuits (paths)	DS0	DS1	DS3	OC3	OC12	OC48
West River	44						

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

this objection, the special circuit paths consist of 3 DS-0 paths and 41 DS-1 paths.

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.**

DR 25 Provide a copy of the documentation describing the architecture, equipment and engineering rules/parameters for the OC-192 transport system represented in your cost studies, or for one commonly used.

OBJECTION AND RESPONSE: **Petitioner objects to this request to the extent that it seeks information which is confidential and proprietary. 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. Without waiving these objections, the OC-192 SONET electronics included in the estimates for the Forward Looking Economic Cost (FLEC) model is available from a number of vendors including Alcatel-Lucent, Cisco Systems, Fujitsu Network Communications, and Nortel Networks. These vendors provide detailed product documentation to consultants and telecommunications service providers within the confines of a Non-Disclosure Agreement. The requested information can be obtained directly from these vendors.**

DR 26 Provide measures of utilization of OC-192 transport electronics underlying the FLEC Model as shown in the following table.

RLEC	OC-192 Nominal Capacity - DS1s	Average Equipped Capacity (DS1s)	% Equipped Capacity of Nominal Capacity	DS1-Equivalents in Service	% Utilization of Equipped Capacity
West River	5,376				

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 West River Cooperative Telephone's "Fiber Table" (West River FLEC:00056) indicates the RLEC has 387.88 miles of fiber cable used for transport (24 cable routes). Why does the 426.68 miles of fiber cable reflected in the West River 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 West River's network diagram (West River FLEC:00006) indicates a 56.8 mile cable routes to McIntosh. Does Alltel mobile-to-land traffic utilize this cable