

In the Matter of the Petition of Golden West Telecommunications Cooperative, Inc., for Suspension of Modification of 47 U.S.C. Section 251 (b)(2) of the Communications Act of 1934 as Amended))))))	Docket No. TC08-014
In the Matter of the Petition of Vivian Telephone Company for Suspension of Modification of 47 U.S.C. Section 251 (b)(2) of the Communications Act of 1934 as Amended))))))	Docket No. TC08-015
In the Matter of the Petition of Kadoka Telephone Company for Suspension of Modification of 47 U.S.C. Section 251 (b)(2) of the Communications Act of 1934 as Amended))))))	Docket No. TC08-016
In the Matter of the Petition of Union Telephone Company for Suspension of Modification of 47 U.S.C. Section 251 (b)(2) of the Communications Act of 1934 as Amended))))))	Docket No. TC08-018
In the Matter of the Petition of Armour Independent Telephone Company for Suspension of Modification of 47 U.S.C. Section 251 (b)(2) of the Communications Act of 1934 as Amended))))))	Docket No. TC08-019
In the Matter of the Petition of McCook Cooperative Telephone Company for Suspension of Modification of 47 U.S.C. Section 251 (b)(2) of the Communications Act of 1934 as Amended))))))	Docket No. TC08-020
In the Matter of the Petition of Bridgewater-Canistota Independent Telephone Company for Suspension of Modification of 47 U.S.C. Section 251 (b)(2) of the Communications Act of 1934 as Amended))))))	Docket No. TC08-021
In the Matter of the Petition of Valley Telecommunications Cooperative Association, for Suspension of Modification of 47 U.S.C. Section 251 (b)(2) of the Communications Act of 1934 as Amended))))))	Docket No. TC08-022
In the Matter of the Petition of Midstate Communications, Inc., for Suspension of Modification of 47 U.S.C. Section 251 (b)(2) of the Communications Act of 1934 as Amended))))))	Docket No. TC08-023

**SECOND SET OF DISCOVERY REQUESTS
FROM VERIZON WIRELESS**

The above-named Petitioners by their attorneys, Darla Pollman Rogers and Margo D. Northrup, of Riter, Rogers, Wattier and Northrup, LLP, hereby responds to Verizon Wireless, LLC (VAW), CommNet Cellular License Holding LLC, Missouri Valley Cellular, Inc., Sanborn Cellular, Inc., Eastern South Dakota Cellular, Inc. d/b/a Verizon Wireless (Verizon Wireless) as follows:

General Objection

Petitioners object to Verizon's interrogatories, admissions and document requests as they pertain to Petitioners and any of its divisions or affiliates, other than Petitioner in its individual capacity as a local exchange carrier operating in South Dakota or as they pertain to other companies, including South Dakota Network, LLC (SDN), because such questions seek information that is not relevant to this proceeding and not reasonably calculated to lead to the discovery of admissible evidence. This General Objection applies to all of Verizon's interrogatories, admissions and document requests.

INTERROGATORIES

Regarding: Circuits in SDN
Witness: Dan Davis, Exhibit 1

Interrogatory 41: Identify each expected task during the 90-120 days you estimate would be needed to install software and install and test the circuits to SDN.

Response:

Contact Switch Vendor or consultant for switch translations
Inform vendor to active LNP-if not already done
Have vendor/engineering consultant perform translations after LRN has been established
Contact NPAC on customer documents
Nondisclosure Agreement - online NPAC.com
User agreement-NPAC
Application-NPAC

User Registration Form-NPAC
SPID (OCN)-NPEC
LRN established by LEC
SOA or NEUSTAR HELP DESK
Contract for SOA if required, none if Helpdesk is used
Point codes and NXXs to NEUSTAR or SOA
Point codes for LIDB; CNAM and CLASS
LIDB provider with NXXs that are portable
Query contract/implementation (Versign)
NXXs and LRNs in LERG
LRN in NPAC (call helpdesk)
Profile or contact info to requesting carrier (After requested)
Establish Transport arrangements with SDN
Internal LSR training; service order revisions; FOC
FAQ for customers
Establish in-house contact for Neustar/SOA
Internal provisioning process
Tech processes for trouble repair; switch provisioning

Interrogatory 42: What do you consider to be the operating capacity of a DS1?

Response: 24 DSOs.

Interrogatory 43: Admit that you could use a DS0 within an existing DS1 to deliver calls to ported-out wireless numbers to SDN. Admit that this can be done from a technical standpoint, and that the traffic you anticipate would not exceed the operating capacity of a DS0. Explain any failure to admit.

Response: The statements are denied on the basis that the existing DS1s to SDN are for toll traffic only.

Interrogatory 44: Identify the number of switches with which you have direct connections with SDN.

Objection: Petitioners object to this request because it is ambiguous, vague and unclear.

Response: Without waiving said objection, none.

Regarding: Costs
Witness: Dan Davis, Exhibit 2

Interrogatory 45: Regarding Confidential Exhibit 2, admit that the costs encompassed within the exhibit must be incurred by you whether or not the Petition is granted in this case. Identify each cost on the exhibit that has already been incurred. Identify by page and paragraph each place in your Petition where you assert that the cost on Exhibit 2 constitute an undue burden or should otherwise be considered in this case.

Response: Petitioners deny that the costs encompassed within Exhibit 2 must be incurred by Petitioners whether or not the Petition is granted in this case. As to costs on the exhibit that have already been incurred, none. See Paragraphs 13-18 of Petition.

Interrogatory 46: With regard to asserted transport costs, admit that if Verizon Wireless remained connected to SDN, that SDN would transit calls to Verizon Wireless for \$0.0035 per minute up to 4,000,000 MOU/month and for \$0.0032 per minute for greater than 4,000,000 MOU/month.

Response: Petitioners believe that Verizon Wireless is not currently connected to SDN for this purpose and the terms of any transiting service by SDN is still subject to negotiation.

Dated this 29 day of July, 2008.

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