

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

In the Matter of the Petition of Interstate Telecommunications Cooperative, Inc., and Hills Telephone Company, Inc. for Suspension of Modification of 47 U.S.C. Section 251 (b)(2) of the Communications Act of 1934 as Amended	) ) ) ) ) ) )	Docket TC08-024
In the Matter of the Petition of West River 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 TC08-025
In the Matter of the Petition of Stockholm Strandburg Telephone Company for Suspension of Modification of 47 U.S.C. Section 251 (b)(2) of the Communications Act of 1934 as Amended	) ) ) ) ) ) )	Docket TC08-026
In the Matter of the Petition of Santel Communications Cooperative, Inc. for Suspension of Modification of 47 U.S.C. Section 251 (b)(2) of the Communications Act of 1934 as Amended	) ) ) ) ) ) )	Docket TC08-027
In the Matter of the Petition of Venture Communications Cooperative, Inc. for Suspension of Modification of 47 U.S.C. Section 251 (b)(2) of the Communications Act of 1934 as Amended	) ) ) ) ) ) )	Docket TC08-11

**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 respond 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.

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

Regarding: Cost to Implement Intermodal LNP  
Witness: John De Witte, Exhibit 1

**Interrogatory 41:** Admit that the costs encompassed with "Switch-Related Investment Costs" and "NPAC-Related Costs" on Exhibit 1 must be incurred by you whether or not your Petition is granted in this case. Identify each such cost that has already been incurred.

**Response:** Deny. The "Switch-Related Investment Costs" and the "NPAC-Related Costs" will only be incurred if Petitioners implement LNP.

**Interrogatory 42:** Identify the components of the costs labeled "Regulatory" and "Marketing/Informational Flyer" and explain in detail whether those costs would have to incur whether or not your Petition is granted in this case. Identify by page and paragraph each place in your Petition where you assert that these costs constitute an undue burden or should otherwise be considered in this case.

**Objection:** Petitioner objects to identifying "regulatory requirements" as the question is vague.

**Response:** Without waiving said objection, the types of activities that will be required to support LNP in the remaining switches in Petitioner's network include, but are not limited to, the following types of tasks:

- Coordination with NPAC regarding company specific NXX and LRN information to be added to NPAC's various databases;

- Coordination COCAG Forms for LERG updates showing various switches as LNP capable, updating LERG data with portable NXX data and LRN data;
- Coordination of SOA Updates (if required);
- Coordination of SS6 Setup for LNP queries with STP Provider (SDN);
- Coordination of LNP Queries with SCP Provider (Verizon);
- Coordination of NECA Traffic changes;
- Coordination of NECA End User Charge (if required).

Concerning the “Marketing/Information Flyers”, this line item is assumed to be a bill stuffer or other marketing communication. The purpose of this marketing information is to explain the LNP End User surcharge should the Petitioner elect to incorporate this fee into their subscriber billing. These costs would not have to be incurred if LNP is not implemented. These costs were not included in the Petitions.

**Interrogatory 43:** Is it your position that there is no indirect interconnection solution (i.e., a solution that would use common trunks to an intermediary carrier) that could be used to deliver calls to ported out numbers to wireless carriers? Please explain your answer.

**Response:** To Petitioners’ knowledge, no carrier has agreed to implement an indirect interconnection solution.

Regarding: Transport Cost to Implement Intermodal LNP  
 Witness: John De Witte, Exhibit 2

**Interrogatory 44:** Is the IntraCompany Transport Rate intended to reflect your cost to deliver a call to a ported-out number to i) your host or tandem switch, ii) your point of interconnection with the terminating carrier, or iii) some other location? Explain your answer in detail.

**Response:** Some other location. As an example, the IntraCompany Transport Rate would apply to the minutes for the ported LNP traffic that were carried from the originating exchange to the point in the Petitioner’s network where the traffic is consolidated and transported to the CMRS carrier. The existing Reciprocal Compensation rate was used to model the IntraCompany Transport Rate since the Petitioner and certain CMRS carriers have agreed to this rate. The actual IntraCompany Transport Rate would require a cost study to determine.

**Interrogatory 45:** Does the recurring cost for Total Estimated LNP Implementation Costs (Option 1 Transport) include your estimated cost to deliver calls to non-ported numbers? Are you claiming that you will be subject to undue economic burden if you are obligated to deliver calls to existing points of connection? Do you claim that the cost of delivering calls to non-ported numbers is a cost of implementing intermodal LNP?

**Response:** No, the recurring cost for Total Estimated LNP Implementation Costs (Option 1 Transport) is not included in the estimates cost to deliver calls to non-ported numbers. Any additional cost imposed on the subscriber for LNP is an undue economic burden. No, the cost of delivering calls to non-ported numbers is not a cost of implementing intermodal LNP.

**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:** To Petitioners knowledge, Verizon Wireless is not connected to SDN for the transit of local calls. Therefore, Petitioners deny the question.

*The following requests are not applicable to Docket No. TC08-025 and TC08-026.*

**Interrogatory 47:** Does your Option 2 assume that all existing direct connections with wireless carriers will be eliminated? On what facts do you base such an assumption?

**Response:** Yes, Option 2 assumes that all existing direct connections with wireless carriers will be eliminated. This assumption was based on the ability of carriers to opt in to interconnections agreements of other carriers. Therefore, if any one carrier is able to force Petitioners to route traffic to Sioux Falls and pay the cost, it was assumed other carriers would opt in to that arrangement.

**Interrogatory 48:** Does the recurring cost for Total Estimated LNP Implementation Costs (Option 2 Transport) include your estimated cost to deliver calls to non-ported numbers? Are you claiming that you will be subject to undue economic burden if you are obligated to deliver calls to existing points of connection? Do you claim that the cost of delivering calls to non-ported numbers is a cost of implementing intermodal LNP?

**Response:** No, the recurring cost for Total Estimated LNP Implementation Costs (Option 2 Transport) included does not include the estimated cost to deliver calls to non-ported numbers. Any additional cost imposed on the subscriber for LNP is an undue economic burden. No, the cost of delivering calls to non-ported numbers was not included as a cost of implementing intermodal LNP.

*The following request is only applicable to Docket No. TC08-025 and TC08-026.*

**Interrogatory 49:** Why did Mr. De Witte not calculate the cost of Option 2 Transport as he did in other cases?

**Response:** There are currently no direct connections with West River or Stockholm Strandburg.

Dated this 29<sup>th</sup> day of July, 2008.

Riter, Rogers, Wattier & Northrup, LLP

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