

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

In the Matter of the Petition of Cheyenne )  
 River Sioux Tribe Telephone Authority for )  
 Arbitration Pursuant to the )  
 Telecommunications )  
 Act of 1996 to Resolve Issues Relating to an )  
 Interconnection Agreement with Alltel )  
 Communications, Inc. )

**Docket No. TC 08-122**

**AFFIDAVIT OF  
RONALD WILLIAMS**

STATE OF WASHINGTON )  
 )  
 COUNTY OF KING )

Ronald Williams, being first duly sworn upon oath, deposes and states as follows:

1. On behalf of Alltel Communications, LLC, I was the contact person with Cheyenne River Sioux Tribe Telephone Authority ("CRST") concerning the bona fide requests CRST made to Alltel.
2. In the fall of 2007, I met with representatives of CRST at its offices to initiate negotiations. At this meeting, I was informed CRST wanted to work from the prior interconnection agreement it had with Alltel and modify that agreement. To that end, I submitted a revised interconnection agreement to CRST. The revised interconnection agreement has been attached to the Petition as Exhibit A and shows redlines and changes made to the old agreement including changes discussed at the meeting.
3. To the extent negotiations were undertaken concerning a new interconnection Agreement, the interconnection agreement attached to the Petition as Exhibit A was the only interconnection agreement I ever recall being exchanged.
4. When CRST filed its petition it included a new interconnection agreement as CRST's Petition Exhibit B. CRST's proposed agreement presents numerous new issues that were

not discussed or raised during the interconnection negotiations between the companies including changing definitions the companies have operated under for as long as ten years.

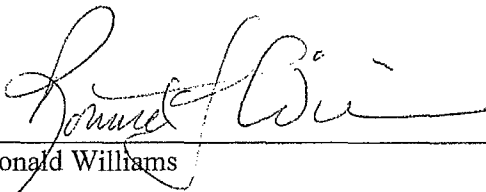
5. I reviewed my files and I do not see where the interconnection agreement now being proffered by CRST and attached to its Petition as Exhibit B, was ever a part of the negotiations.

6. Additionally, through counsel, requests have been made to CRST to provide Alltel with documentation showing that Exhibit B to CRST's Petition was proffered during any negotiations. Nothing has been provided in response to this request.

7. Exhibit A and Exhibit B have extensive language differences. Some of the language differences may be minor, but all language differences essentially will have to be resolved by this Commission if both interconnection agreements are going to be considered in this arbitration.

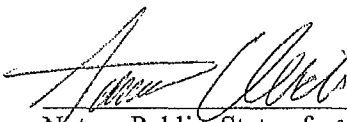
8. Since Exhibit B was never discussed through negotiations, it should not be part of the arbitration and not considered in the arbitration.

Dated this 8<sup>th</sup> day of June, 2009.

  
\_\_\_\_\_  
Ronald Williams

Subscribed and sworn to before me this 8 day of June, 2009.



  
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Notary Public, State of Washington  
My commission expires: May 26, 2010