

EXHIBIT I
PUBLIC VERSION



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February 2, 2012

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VIA EMAIL

G. David Carter
Arent Fox LLP
1050 Connecticut Ave, NW
Washington, DC 20036

**Re: In the Matter of the Complaint of South Dakota Network, LLC Against
Sprint Communications Company L.P.
Court File No. TC 09-098**

Dear David:

Following the Commission's receipt of Northern Valley's Counterclaim, Sprint has re-evaluated your November 7, 2011 letter regarding open discovery issues. As you know, Sprint did address a number of those issues when it served amended responses in December, but there are disputes that remain open.

IRs 1 and 24

Sprint believes its responses are appropriate and consistent with Commission practice. In addition, Northern Valley will have an opportunity to conduct discovery as to statements made in Sprint's filed testimony.

IR 4

IR 4 asks Sprint to identify LECs Sprint has paid, or does pay, terminating switched access charges for calls to CCCs. Sprint has confirmed that it does not knowingly pay terminating access charges for pumped traffic in South Dakota, and declines to provide any additional response.

IRs 7, 8, and 9; DRs 23, 26, 34, 35, and 36

These interrogatories and document requests seek Sprint's revenue information, both for interstate and intrastate calls. We have documented the burdensomeness of the request. In addition, we disagree that the Commission's evaluation of Northern Valley's Counterclaim under SDCL 49-13-13 would allow the Commission to use Sprint's revenue information to set a rate to be charged by Northern Valley. As Northern Valley conceded at the hearing in December, any such rate setting would have to be done in compliance with South Dakota statutes. Nothing in those statutes allows the Commission to set a rate based on one customer's revenue. We would be happy to evaluate any authorities you believe hold otherwise.

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DR 1

Document Request No. 1 asks for all documents that refer to, relate to, or evidence statements made by Sprint regarding its traffic pumping disputes. Sprint has produced certain public statements, and has produced its internal documents related to the disputes with Northern Valley, Splitrock, Sancom, and Native American Telecom. To meet the substance of this request, Sprint would have to re-run its document production, identify every document related to traffic pumping, review all those documents for responsiveness and privilege, and then produce the remainder. As I believe you understand from work in other cases, this would be an enormous number of documents to be reviewed for production.

Neither Sprint's internal statements regarding traffic pumping, nor its disputes with other carriers, have anything to do with this case, and do not bear at all on either Sprint's crossclaim or Northern Valley's Counterclaim.

IR 14

Sprint does not believe this request seeks documents that bear in any way on the issues before the Commission.

IRs 15 and 16

Sprint does not intend to provide additional supplementation beyond that provided on December 5, 2011.

Very truly yours,


Philip R. Schenkenberg

PRS/smo

cc: Sprint Communications Company L.P.