

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

IN THE MATTER OF THE COMPLAINT )  
OF SOUTH DAKOTA NETWORK, LLC, )  
AGAINST SPRINT COMMUNICATIONS )  
COMPANY LP )

DOCKET NUMBER TC 09-098

IN THE MATTER OF THE THIRD )  
PARTY COMPLAINT OF SPRINT )  
COMMUNICATIONS COMPANY L.P. )  
AGAINST SPLITROCK PROPERTIES, )  
INC., NORTHERN VALLEY )  
COMMUNICATIONS, INC., SANCOM, )  
INC., AND CAPITAL TELEPHONE )  
COMPANY )

**AFFIDAVIT OF  
BRUCE R. TILLOTSON**

STATE OF KANSAS )  
 ) ss  
COUNTY OF JOHNSON )

**BRUCE R. TILLOTSON**, being duly sworn under oath, states and alleges as follows:

1. I am a Billing Analyst for Sprint Communications Company L.P. I have personal knowledge of the information in the affidavit, which I have acquired in performing my job functions with Sprint.

2. I work in Sprint's Information Technology Department and generally have no involvement with respect to Sprint's traffic pumping disputes. However, I have been asked to estimate the effort that would be required for Sprint to pull and produce certain wholesale billing information in response to a discovery request in the above case.

3. I have been advised that Northern Valley's Interrogatory No. 8 reads as follows:

For the period January 1, 2005 to the present, set forth the gross revenues associated with being selected to deliver traffic on behalf of other carriers as a result of Least Cost Routing for each month for the traffic delivered to Northern Valley by Sprint.

4. Sprint does not have this information requested for any month – we simply do not track gross revenues by terminating company. For this information to be provided it would have to be developed.

5. The data base that maintains wholesale billing information only has terminating operator carrier number (OCN) information going back to December 2006, and so I do not believe we could provide any response for periods before that date.

6. To collect the information for any later period, we would have to run a query for each monthly time period to determine the identity of all wholesale carriers that delivered calls to Sprint, destined to Northern Valley's OCN, during that month. This first step would take approximately 1 (one) hour of time to complete for each monthly time period run, and so 60 (sixty) hours for the five year period between January 2007 and the end of 2011. I would expect there to be dozens of wholesale customers billed for each billing month.

7. Once that first step was done we would need create a summary of the query data for each of those wholesale customers that would show the number of minutes billed for each month for calls to Northern Valley's OCN. This would take approximately 1 (one) hour of time to complete for each monthly time period run in the first step, and so 60 (sixty) hours for the five year period between January 2007 and the end of 2011. This summary would show minutes billed, by month and by carrier, for all wholesale customers.

8. For a fraction of these wholesale customers, the summary would show the amounts billed for delivering the call to Northern Valley. For the remaining customers, the summary would show a composite rate that did not separate out the portion attributable to delivery to Northern Valley. I have no way to determine the Northern Valley portion from the

composite rate, but might be able to make an estimate if I spent 1 (one) hour for each wholesale customer.

9. In neither of the above instances would the summary show revenues received – just amount billed. I do not believe I could identify the amount received by Sprint attributable to traffic delivered to Northern Valley’s OCN.

10. I have been advised that Document Requests 26 and 35 read:

**REQUEST 26:** For the period January 1, 2005 to present, produce one or more Documents that identify the volumes of traffic delivered to Northern Valley by Sprint on its own behalf and on behalf of each of its wholesale customers and gross revenues associated with the traffic delivered on behalf of each wholesale customer.

**REQUEST 35:** Produce one or more Documents sufficient to demonstrate the gross revenues that You have received during the relevant time period from other telecommunications carriers as a result of Least Cost Routing and being selected to deliver traffic for or on behalf of other carriers to Northern Valley.

I do not believe Sprint has any documents that would contain this information, or that Northern Valley would find sufficient to demonstrate this information.

FURTHER Affiant sayeth naught.

  
Bruce R. Tillotson

Subscribed and sworn to before me  
this 12<sup>th</sup> day of March, 2012.

  
Notary Public

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