

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA

IN RE:

Docket No.TC10-026

SPRINT COMMUNICATIONS
COMPANY L.P.,

Complainant,

v.

NATIVE AMERICAN TELECOM, LLC,

Respondent.

**SPRINT COMMUNICATIONS
COMPANY L.P.'S FIRST SET OF
INTERROGATORIES AND
DOCUMENT REQUESTS**

**TO: Native American Telecom, LLC and its counsel, Scott Swier, Swier Law
Office, Prof. LLC, 133 N. Main Street, P.O. Box 256, Avon, SD 57315:**

Sprint Communications Company L.P. ("Sprint") serves the following Interrogatories and Document Requests pursuant to S.D. Admin. R. 20:10:01:01.02 and 20:10:01:22.01 and S.D.C.L. §§ 15-6-26(a), 15-6-33(a), 15-6-34. Native American Telecom, LLC ("NAT") must answer these discovery requests within 30 days of service in accordance with the Rules.

INSTRUCTIONS

1. Each interrogatory and request is to be answered separately.
2. If you are unable to answer any discovery request completely, so state, answer to the extent possible, set forth the reasons for your inability to answer more fully, and state whatever knowledge or information you have concerning the unanswered portion.

EXHIBIT 1

3. If any act, event, transaction, occasion, instance, matter, course of conduct, course of action, person or document is mentioned or referred to in response to more than one of these discovery requests, you need not completely identify and describe it or him in every such instance, provided you supply a complete identification in one such instance and in each other such instance make a specific reference to the place in the answers to these discovery requests where it or he is fully identified and described, giving page number and the beginning and ending line numbers.

4. If you refuse to provide information on the basis that an interrogatory or request calls for privileged information, identify:

- (a) The name and address of the speaker or the author of the document that contains any part of the information withheld;
- (b) The date of the communication or document;
- (c) The name and address of any person to whom the communication was made or the document was sent or received or to whom copies were sent or circulated at any time;
- (d) The form of the communication or document (*i.e.*, letter, memorandum, invoice, contract, etc.);
- (e) The names and addresses of any person currently in possession of the document or a copy thereof; and
- (f) A description of the subject matter of the communication or document; and the specific grounds for withholding the information and the nature of the privilege claimed.

5. Whenever you are asked for the identity of or to identify a person, please state with respect to each such person:

- (a) The person's name;
- (b) The person's last known address;

- (c) The person's status as an enrolled member of the Crow Creek Sioux Indian Tribe;
- (d) The person's current business affiliation and title;
- (e) The person's current business address; or if that be unknown, the person's last known business address; and
- (f) The business affiliation, business address and the correct title of such person with respect to the business, organization, or entity with which the person was associated and the capacity in which such person acted in connection with the subject matter of this interrogatory or request.

6. Whenever you are asked the identity of or to identify an oral statement, or the answer to an interrogatory refers to an oral statement, state with respect to each such oral statement:

- (a) The date and place each such oral statement was made;
- (b) The identity of each person who participated in or heard any part of such oral statement;
- (c) The substance of what was said by each person who made such oral statement;
- (d) The name and identity of the custodian of any written record or any mechanical or electrical recording that recorded, summarized or confirmed such oral statement; and
- (e) Whether each person is an enrolled member of the Crow Creek Sioux Indian Tribe.

7. Whenever you are asked to identify a document, please provide a description or bates number that will allow Sprint to identify the document as produced.

8. The interrogatories and requests shall be deemed to be continuing under Rule 15-6-26 of the South Dakota Rules of Procedure in Circuit Court and should be supplemented in accordance with the South Dakota Rules of Procedure in Circuit Court.

9. Please be advised that your answers must include all information available not only to you, but to your agents, officers, representatives, employees, attorneys, insurers, or others who have information available to you upon inquiry to them.

10. Electronic Documents and Hard Copy Paper Documents should be produced as TIF image files in an electronic format. Specifically, the TIF images should be produced as a single-page Group IV TIF format and accompanied by an IPRO LFP load file (or other generally acceptable load file format). The full extracted or OCR text should be included and produced at a document level and located in the same folder as the respective document image. Metadata information should be produced in the Concordance DAT file format or other mutually-acceptable format. The DAT file or other mutually-agreeable format should provide the following meta-data fields: custodian name, filename or subject line, original path or inbox folder path, To, From, CC, BCC, create date, modify or sent date, beginning and ending bates numbers, page count, and attachment range. Electronic spreadsheets should be produced in native format.

11. The singular should be construed as plural and vice versa.

12. "And" should be construed to include "or" and vice versa.

13. Unless otherwise directed, you should answer these interrogatories and requests for August 1, 2008, forward.

DEFINITIONS

“**Affiliate**” means a person or entity that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another person.

“**Business Relationship**” means a commercial relationship of any kind in which one party provides goods or services to the other, including, without limitation, a buyer-seller relationship, a provider-customer relationship, a lessor-lessee relationship, a partnership, and a joint venture.

“**Call Connection Company**” means any entity that itself or through an affiliated entity advertises, markets, or provides the ability for consumers to access or obtain a Call Connection Service.

“**Call Connection Service**” means any service, product, or offering that provides the ability for consumers to dial a telephone number associated with NAT i) to make international calls by dialing a non-international number, ii) to make toll-free calls by first dialing a NAT telephone number, iii) to make conference calls or connect to a chat line or adult service, or iv) to hear a recording. It also includes any service provided by an entity via telephone when that service generates compensation to the entity from NAT based upon the volume of traffic generated by or delivered to the entity (for example, any service that receives revenue for each minute of access traffic it generates).

“**Correspondence**” shall mean any written communication, including but not limited to: emails, letters exchanged by U.S. Mail, overnight mail, facsimile, or any other transmission method.

“**Document**” means the complete original, complete copy of the original, and each non-identical copy (whether different from the original because of notes made on the copy or otherwise) of any written, printed, typed, photocopied, photographic and graphic matter of any kind or character, and any recorded material, however produced or reproduced, in your possession or control, or known by you to exist, including, without limiting the generality of the foregoing, all “documents and electronically stored information” within the meaning of South Dakota Rule of Procedure in Circuit Court 15-6-34(a), and all drafts, contracts, diaries, agreements, calendars, desk pads, correspondence, computer printouts, telegrams, teletypes, memoranda, notes, studies, reports, lists, minutes, maps, graphs and entries in books of account relating in any way to the subject matter of these discovery requests.

“**Each**” means each and every.

“**Including**” means “including, but not limited to.”

“**Local Exchange Carrier**” shall have the meaning set forth in 47 U.S.C. § 153(32).

“**NAT**” or “**you**” includes any of your agents, officers, directors, or persons otherwise acting on your behalf.

“**Sprint**” refers to Sprint Communications Company L.P.

INTERROGATORIES

INTERROGATORY NO. 1: Describe the interest of each person or entity with an ownership interest in NAT.

INTERROGATORY NO. 2: Describe the interest of each person or entity in which NAT has an ownership interest.

INTERROGATORY NO. 3: Identify the nature and extent of the relationship between you, Native American Telecom Enterprise, LLC, Native American Telecom – Crow Creek, LLC; Native American Telecom – Crow Creek, and Widevoice Communications, Inc.

INTERROGATORY NO. 4: Identify the nature and extent of the relationship between you and Midstate Communications.

INTERROGATORY NO. 5: Identify the nature and extent of the relationship between you and AT&T Communications of the Midwest, Inc.

INTERROGATORY NO. 6: Identify every Call Connection Company with which you have or have had any kind of Business Relationship.

INTERROGATORY NO. 7: For each Call Connection Company with which you have or have had any kind of Business Relationship, describe in detail the Call Connection Service provided by the Call Connection Company for the existence of the Business Relationship.

INTERROGATORY NO. 8: For each month beginning with January 2009, identify by each Call Connection Company the intrastate and interstate minutes for which you have billed access charges, the intrastate and interstate per-minute rates, minutes of use and total dollar amounts that you have billed by company billed, and all tariff provisions on which you rely as a basis for billing those charges.

INTERROGATORY NO. 9: For each Call Connection Company to which you have routed calls, identify and describe the services, goods, or products you provide to the Call Connection Company, including all features and practices associated with the provisions of each service, the specific tariff or contract provision(s) pursuant to which each service, good, or product is provided, and the telephone number(s) or block(s) of telephone numbers that you assigned to the Call Connection Company.

INTERROGATORY NO. 10: Identify all payments made to you by the Call Connection Company with respect to the services, goods, or products you provided including the basis for the payment, the amount paid, the dates paid, and the form of the payment. To the extent that the facts forming your answer to this Interrogatory have changed during the relevant time period for particular Call Connection Companies, please answer the question for each discrete period and identify the dates to which your answers apply.

INTERROGATORY NO. 11: For each Call Connection Company to which you have routed calls or have assigned one or more telephone numbers, describe and diagram how calls to the numbers associated with those Call Connection Companies are routed. In so doing, identify the ownership, type and location of the facilities over which a call travels from the long-distance network to equipment used by the Call Connection Company to provide Call Connection Services. For purposes of clarity, for each and every discrete action in the routing of calls, such description should include the end office switch the Call Connection Company's equipment is connected to (including the CLLI code, ownership, and location of switch used to provide end office switching, as well as whether any of that switch capacity has been leased to the Call Connection Company);

whether the Call Connection Company's equipment is connected to the switch via a trunk side connection or a line side connection, the ownership, type and location of the connection (whether TDM or SIP, for example); whether the Call Connection Company's equipment is located in a collocation space or other space, who owns the space, and who leases the space if anyone; the ownership, type and location of the platform, computer, intelligent voice response system, or other piece of equipment used by the Call Connection Company; and whether the traffic is transported further after reaching the Call Connection Company or whether the final party to whom the calling party is communicating is located at the platform. To the extent that the facts forming your answer to this Interrogatory have changed during the relevant time period for particular Call Connection Companies, please answer the question for each discrete period and identify the dates to which your answers apply.

INTERROGATORY NO. 12: For 2008, 2009, and 2010, identify by month the total access lines you serve and identify by month and by exchange the total number of your residential customers and the total number of your non-Call Connection Company business customers physically located in each exchange.

INTERROGATORY NO. 13: For you, your officers, directors, employees, shareholders, owners, members, affiliates, subsidiaries, agents, representatives, or consultants that have any ownership interest, partnership, membership, profit participation, compensation arrangement, employment, or other agreement of any kind with any Call Connection Company, identify those persons and the Call Connection Companies with which they have such relationships and describe the relationships.

INTERROGATORY NO. 14: Identify any and all payments you have made related to a Call Connection Service or Call Connection Company (including, for example, any payments to brokers for facilitating agreements with Call Connection Companies or payments based on traffic generated by Call Connection Companies), or which otherwise resulted from or were caused by the calls within the scope of the Complaint or Counterclaim. Identify the dates of all such payments, the way in which such payments were made (i.e., via check, credit, offset, etc.), and the terms of any agreements, understandings or tariff provisions relating to such payments, and the method of calculating the amounts billed or paid, including any associated rates.

INTERROGATORY NO. 15: For each service that you provide to any Call Connection Company, identify the terms of any tariff, agreement or understanding pursuant to which the same service is provided by you to others who are not Call Connection Companies. For example, if you provide collocation to Call Connection Companies and also provide it to others who are not Call Connection Companies, state the terms under which collocation is provided to those who are not Call Connection Companies.

INTERROGATORY NO. 16: Identify any filings with any governmental or quasi-governmental body that include revenues derived from Call Connection Companies or lines associated with Call Connection Companies (including any reports made to the Federal Communications Commission, a state public utilities commission, a tribal utility authority, the Universal Service Administrative Company or any tax agency), including identification of the specific part of the filings that reflect such revenues or lines.

INTERROGATORY NO. 17: Identify those reasons for which your services provided to Sprint are classified as switched access services.

INTERROGATORY NO. 18: Identify those reasons for which your services provided to Call Connection Companies should not be classified as collocation services.

INTERROGATORY NO. 19: Regarding your Wimax equipment, identify the type of equipment used by you, and the range and location of such equipment.

INTERROGATORY NO. 20: If you claim that you are providing service exclusively to enrolled Crow Creek tribal members residing within the boundaries of the Crow Creek Indian Reservation, identify the practices and procedures by which you determine that a customer to whom you are providing service is an enrolled Crow Creek tribal members residing within the boundaries of the Crow Creek Indian Reservation. Identify these practices and procedures for current as well as prospective customers.

INTERROGATORY NO. 21: For each and every bill submitted to Sprint or any other interexchange carrier on your behalf, identify each and every bill and provide the call data supporting any change for intrastate charges assessed by you. Please also identify how many calls were made and completed purely within the exterior boundaries of the Crow Creek Indian Reservation.

INTERROGATORY NO. 22: For each and every bill you identified in your answer to Interrogatory No. 21, please identify whether the interexchange carrier to whom the bill was submitted challenged or disputed the charges contained therein. Please further identify the status of any such challenge or dispute, including whether the challenge has been resolved, whether payment has been received by you, and whether the

interexchange carrier has lodged any type of complaint against you with any regulatory body.

INTERROGATORY NO. 23: Identify each and every payment NAT has made to any enrolled Crow Creek Tribal member or any person having a residence or business within the exterior boundaries of the Crow Creek Indian Reservation.

INTERROGATORY NO. 24: Identify all regulatory oversight exercised by the Crow Creek Tribal Utility Authority over you, including any filings, audits, or tariffs.

DOCUMENT REQUESTS

DOCUMENT REQUEST NO. 1: Produce all documents relied upon in any way in answering the preceding Interrogatories.

DOCUMENT REQUEST NO. 2: Produce a diagram depicting the NAT corporate structure (*i.e.*, identifying any parent, subsidiary, and/or affiliate companies) and/or all other documents sufficient to identify NAT's parent, subsidiary, and/or affiliate companies.

DOCUMENT REQUEST NO. 3: Produce all documents that reflect NAT's alleged status as a tribal organization or entity.

DOCUMENT REQUEST NO. 4: Produce all documents that reflect NAT Board of Directors' minutes, meetings, and resolutions, and NAT's bylaws.

DOCUMENT REQUEST NO. 5: Produce all documents exchanged between your officers Gene DeJordy and Thomas Reiman related to the subject of Sprint's Amended Complaint or your Answer.

DOCUMENT REQUEST NO. 6: Produce all documents that refer to the relationship between you, Native American Telecom Enterprise, LLC, and WideVoice Communications, Inc.

DOCUMENT REQUEST NO. 7: Produce all documents evidencing the easements, licenses, permissions and other land rights the Crow Creek Sioux Tribe has contributed to NAT.

DOCUMENT REQUEST NO. 8: Produce documents sufficient to show both NAT's total number of originating and its total number of terminating access minutes, broken down by intrastate and interstate minutes, and the charges NAT billed interexchange carriers for those minutes for all time periods within the scope of the Amended Complaint.

DOCUMENT REQUEST NO. 9: Produce documents sufficient to show that NAT provides service exclusively within the boundaries of the Crow Creek Indian Reservation.

DOCUMENT REQUEST NO. 10: Produce documents sufficient to show that NAT provides services exclusively to enrolled members of the Crow Creek Sioux Indian tribe living within the boundaries of the Crow Creek Indian Reservation.

DOCUMENT REQUEST NO. 11: Produce all documents that reflect the procedure by which NAT determines if it may provide service to a potential customer.

DOCUMENT REQUEST NO. 12: Produce all documents submitted to the Crow Creek Tribal Utility Authority to obtain your authority to provide telecommunications services on the Crow Creek Reservation.

DOCUMENT REQUEST NO. 13: Produce bills issued by NAT to Call Connection Companies, all documents relating to such bills, and all documents reflecting payments or other consideration given to NAT or any of its Affiliates in response to such bills.

DOCUMENT REQUEST NO. 14: Produce bills issued by NAT or on your behalf to any interexchange carrier for intrastate switched access services.

DOCUMENT REQUEST NO. 15: Produce all documents that reflect or otherwise identify call traffic (or the volume of such traffic) that has been routed to you from Sprint and then sent to a Call Connection Company, excluding CDR information.

DOCUMENT REQUEST NO. 16: Produce all documents related to any payments or other consideration you have made or received related to any Call Connection Service or Call Connection Company (regardless of whether any payments were netted against other payments), including payments to any brokers or consultants related to a Call Connection Company or related to a Call Connection Service, and including all documents showing how any payments encompassed within this document request were calculated.

DOCUMENT REQUEST NO. 17: Produce all documents reflecting any service that you allege you provided to any Call Connection Company.

DOCUMENT REQUEST NO. 18: Produce all documents (including proposals, offers, business plans, contracts, agreements, or other communication) from January 2008 forward exchanged between you and any Call Connection Company to whom you have delivered traffic that is the subject of the Complaint. Include in your response any revenue agreement referenced by Section 6.1 of the Joint Venture Agreement between the Crow Creek Sioux Tribe, WideVoice and Native American Telecom Enterprises.

DOCUMENT REQUEST NO. 19: Produce all documents (including proposals, offers, business plans, contracts, agreements, or other communication) from January 2008 forward exchanged between you and WideVoice.

DOCUMENT REQUEST NO. 20: Produce all documents (including proposals, offers, business plans, contracts, agreements, or other communication) from January 2008 forward exchanged between you and the Crow Creek Tribal Council.

DOCUMENT REQUEST NO. 21: Produce all documents (including proposals, offers, business plans, contracts, agreements, or other communication) from January 2008 forward exchanged between you and the Crow Creek Tribal Utility Authority.

DOCUMENT REQUEST NO. 22: Produce all documents regarding Call Connection Companies or regarding brokers or agents who were representing Call Connection Companies or who were trying to broker an agreement based on which they would receive fees for facilitating an increase in access traffic. Include all documents regarding the consideration of, and the decision to enter any agreements under which traffic is sent to Call Connection Companies, or to make payments based on the volume of access traffic generated, or to undertake any other effort to increase access traffic.

DOCUMENT REQUEST NO. 23: Produce all documents (including proposals, offers, business plans, contracts, agreements, or other communication) exchanged between you and any Local Exchange Carrier, or any other entity or person (including brokers or consultants) regarding or otherwise relating to Call Connection Companies, Call Connection Services, traffic that will be or has been sent to Call Connection Companies, or service that will be or has been ordered by Call Connection Companies from you.

DOCUMENT REQUEST NO. 24: For each Call Connection Company to which you have delivered calls that are the subject of this Complaint, produce documents sufficient to identify the telephone number(s) or block of telephone numbers that you have assigned to the Call Connection Company and the date the number was assigned and their effective service date.

DOCUMENT REQUEST NO. 25: Produce all documentation and internal or external communications reflecting, discussing, or analyzing the assignment of telephone numbers to Call Connection Companies, the changing of phone numbers for any and all lines or services associated with Call Connection Services, reasons for changing such numbers, and any requests to do so.

DOCUMENT REQUEST NO. 26: Produce all website information, advertisements or other marketing materials in your possession concerning each and every Call Connection Service or Call Connection Company to which you send traffic or have considered sending traffic, including all prior or draft versions of such website information, advertisements, or marketing materials regardless of when created, used, or effective. In addition to the marketing materials themselves, produce any documents or communication related to advertising or marketing of Call Connection Services.

DOCUMENT REQUEST NO. 27: Produce all documents showing the type of service provided by each Call Connection Company to which you transmit traffic.

DOCUMENT REQUEST NO. 28: For each person or entity identified in response to Interrogatory No. 9, produce all documents that relate to any such ownership interest, partnership, membership, profit participation, compensation arrangement, or other

agreement, including the agreements themselves, documents related to negotiation of such agreements, and invoices or other documents related to payments pursuant to such agreements.

DOCUMENT REQUEST NO. 29: For each entity or person identified in response to Interrogatory No. 7, produce the following categories of documents concerning that entity or person:

- (a) written contracts, agreements, arrangements, or documents of understanding;
- (b) negotiations files for any contracts, agreements or arrangements (written, oral, implied or express);
- (c) documents supporting written, oral, implied or express contracts, agreements or arrangements;
- (d) emails and other correspondence exchanged with the entity or person;
- (e) invoices to or from the entity or person;
- (f) documents evidencing payment from or to the entity or person;
- (g) all documents exchanged with any person about or relating to the revenue sharing with the entity or person;
- (h) all other documents relating to the entity or person;
- (i) all documents relating to revenue sharing of any kind.

DOCUMENT REQUEST NO. 30: Produce all documents relating to revenue sharing with Call Connection Companies, as well as documents relating to any contemplated revenue sharing with Call Connection Companies.

DOCUMENT REQUEST NO. 31: Produce documents that show the source of your revenues, including any documents that show what portion of revenues come from Call Connection Companies, business customers, residential customers, access charges on

calls to Call Connection Companies, access charges on calls to non-customers (that are not to Call Connection Companies), and other sources of revenue. Include your financial statements (unaudited and audited if available) and those of your Affiliates, including Balance Sheets, Income Statements, and Statements of Cash Flow, for 2009 and 2010.

DOCUMENT REQUEST NO. 32: Produce documents that reflect or memorialize the terms under which you use any switches identified in response to Interrogatory No. 11.

DOCUMENT REQUEST NO. 33: Produce complete copies of your state, federal, and tribal access tariffs, and your local service tariffs, in electronic format, for all time periods within the scope of the Complaint.

DOCUMENT REQUEST NO. 34: Produce all documents discussing the reasons for or otherwise relating to any changes in your state and federal switched access and local service tariffs for all time periods within the scope of the Complaint.

DOCUMENT REQUEST NO. 35: Produce all documents relating to whether your federal or state tariffs authorized the imposition of charges on any long-distance carrier for call traffic to a Call Connection Service or Call Connection Company.

DOCUMENT REQUEST NO. 36: Produce all documents relating to disputes between you and other companies relating to access charges on calls to any Call Connection Company or otherwise involving issues similar to those raised in the complaint, including documents relating to settlements of such disputes.

DOCUMENT REQUEST NO. 37: Produce all documents regarding any rates charged to or paid by any interexchange carriers other than Sprint related to access charges for calls directed to Call Connection Services or Call Connection Companies that differ from the

rates charged to Sprint, including any documents reflecting base rates, volume of calls billed at such rates, and payments received for charges at such rates. With respect to bills, provide only a sample of a bill for each company at each particular rate (in other words, if you billed company X, Y cents per minute for 20 months, only a bill for one month should be produced).

DOCUMENT REQUEST NO. 38: Produce sufficient documents to identify switching equipment used to route Call Connection Service or Call Connection Company traffic, including the make, model, year purchased, and CLLI code, and produce any and all documents that diagram how the Call Connection Service or Call Connection Company traffic is routed.

DOCUMENT REQUEST NO. 39: Produce all documents showing whether taxes were paid on any payments made by Call Connection Companies to you for services they received, or discussing whether taxes should be paid on such payments.

DOCUMENT REQUEST NO. 40: Produce all documents showing whether the lines used by Call Connection Companies are reported as access lines to the FCC or any state utility agency.

DOCUMENT REQUEST NO. 41: Produce all documents showing whether the numbers used by Call Connection Companies are included in directory listings or whether any requests have been made by Call Connection Companies for nonpublished numbers.

DOCUMENT REQUEST NO. 42: Produce all documents showing the location of the equipment of all Call Connection Companies to which you provide service or with which

you do business, or otherwise showing the geographic and network location at which calls directed to Call Connection Companies terminate.

DOCUMENT REQUEST NO. 43: Produce all documents showing the call path for calls directed to numbers associated with Call Connection Companies or Call Connection Services.

DOCUMENT REQUEST NO. 44: For all equipment and facilities identified in Interrogatory No. 11, produce documents sufficient to show the ownership of such equipment or facilities by any party and whether and to whom such equipment or facilities are leased.

DOCUMENT REQUEST NO. 45: Produce documents related to any actual or potential revenue sharing arrangement with or other payments to any individual or entity you believe to be a "customer" or "end user," including contracts or documents related to negotiations concerning such revenue sharing or payments, and documentation of any such arrangements or payments.

DOCUMENT REQUEST NO. 46: Produce documents related to any advice you have received regarding any actual or potential revenue sharing arrangement with or other payments to any individual or entity you believe to be a "customer" or "end user," or any revenue sharing arrangement with or payments to any Call Connection Company.

DOCUMENT REQUEST NO. 47: Provide all documents that describe or relate to your standard business practices for tariffed services.

DOCUMENT REQUEST NO. 48: Provide all documents discussing, referring to or reflecting the nature of your relationship with Call Connection Companies, including any

documents using the term customer, partner or end user to refer to Call Connection Companies and any documents discussing whether those terms should be used to refer to Call Connection Companies.

DOCUMENT REQUEST NO. 49: Produce any documents relating to any cost studies you have conducted to support switched access rates or that otherwise quantify the costs incurred by NAT in providing switching, transport, or any other network facilities used in the service you provide to Sprint.

DOCUMENT REQUEST NO. 50: Produce documents (including booked expenses) sufficient to show the costs incurred by NAT in carrying switched access traffic or traffic from long distance carriers that ultimately terminates with Call Connection Companies, as well as any projections as to future costs related to carrying this traffic. The costs should include any purchase price, installation cost, maintenance and operation cost, depreciation schedules and replacement cost of all equipment or facilities. If any of the equipment is leased, it should include the lease price.

DOCUMENT REQUEST NO. 51: Produce documentation showing the volume and peak volumes each month of call traffic flowing over your network, including any documentation that breaks volume numbers into categories (such as switched access traffic, traffic to Call Connection Companies, and any other traffic that has flowed over your network, including the amount that has flowed over particular facilities within your network (i.e. the amount of traffic that has flowed over each end office switch)).

DOCUMENT REQUEST NO. 52: Produce all documentation on the capacity of each piece of equipment over which Sprint traffic flows to Call Connection Companies, illustrating how many simultaneous calls the equipment can handle.

DOCUMENT REQUEST NO. 53: Produce all documentation of the rate of return that you have received on switched access traffic and on traffic to Call Connection Companies for the period of time within the scope of the complaint, including the rate of return you would have received if all interexchange carriers had paid the bills you sent to them.

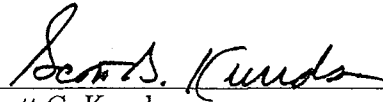
DOCUMENT REQUEST NO. 54: Produce the file maintained by any expert witness you expect to testify on your behalf at trial in this litigation, and all documents reviewed by such expert and communications between you and such expert.

DOCUMENT REQUEST NO. 55: Produce all communications between your attorney and an expert witness you expect to testify on your behalf at trial in this litigation that i) relate to the compensation for the expert's study or testimony; ii) identify facts or data provided to the expert; or iii) identify assumptions provided to the expert.

DOCUMENT REQUEST NO. 56: Produce copies of all expert reports or prefiled testimony submitted by any testifying expert in or after January 2006.

Dated: January 31, 2011.

BRIGGS AND MORGAN, P.A.



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**COUNSEL FOR SPRINT
COMMUNICATIONS COMPANY, LP**

3095404v5

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
SOUTHERN DIVISION

SPRINT COMMUNICATIONS COMPANY
L.P.,

Plaintiff,

v.

NATIVE AMERICAN TELECOM, LLC., B.J.
JONES, in his official capacity as Special
Judge of Tribal Court; and CROW CREEK
SIOUX TRIBAL COURT,

Defendant.

Court File No. 4:10-CV-04110-KES

**AFFIDAVIT OF SERVICE VIA E-MAIL
AND U.S. MAIL**

Brooke C. Swenson, being first duly sworn, deposes and states that on the 31st day of January, 2011, she served the following by email and U.S. Mail

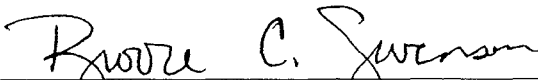
1. Sprint Communications Company L.P., First Set of Interrogatories and Document Requests

upon:

DELIVERY VIA E-MAIL AND U.S. MAIL

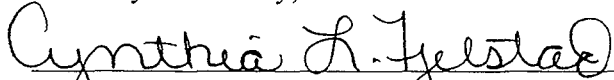
Scott R. Swier
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(Which is the last known email address and mailing address of said person) by email and U.S. Mail true and correct copies thereof.



Brooke C. Swenson

Subscribed and sworn to before me this
31st day of January, 2011



Cynthia L. Fjelstad
Notary Public

