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April 20, 2011

VIA EMAIL and U.S. MAIL
Talbot Wiczorek, Attorney
Gunderson, Palmer, Nelson & Ashmore, LLP
Assurant Building
440 Mt. Rushmore Road
P.O. Box 8045
Rapid City, South Dakota 57709-8045

RE: In the Matter of the Petition of Cellco Partnership, PUC Docket No. TC10-090

Dear Talbot:

In response to your letter of April 12th and our discussions via teleconference with you and Andrew Carlson on April 19th, concerning the discovery response issues raised by your client in the above referenced Docket, SDTA and Golden West Telecommunications Cooperative ("Golden West") would offer the following:

- (1) With regard to Interrogatory No. 7 and Request for Production of Documents (RFP) No. 1, which seek Golden West's and all SDTA member company ETC-related compliance filings, annual reports, periodic progress reports, tariffs, and other documents submitted to the Commission since January 1, 2009 (including all information within any such filings that is deemed confidential), SDTA and Golden West continue to stand on their earlier responses. SDTA and Golden West continue to object to the Interrogatory and RFP on grounds that it is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Your client has specifically communicated an interest in being able to review information presented within Golden West's and SDTA member company ETC compliance filings that has been designated and filed as confidential. This would, generally, include individual company financial information and individual company network infrastructure investment plans. SDTA and Golden West continue to question why Cellco d/b/a Verizon Wireless sees this information as being relevant to it being able to prove that it has in the past or is currently meeting Eligible Telecommunications Carrier (ETC) service obligations. Golden West and all of the SDTA member companies are wireline carriers (unlike Verizon Wireless) and, thus, there would seem to be little, if any, value to drawing comparisons related to the existing networks of the different entities or the efforts undertaken by such entities to reach all customers.

Robert C. Riter, Jr.
Margo D. Northrup

Jerry L. Wattier
Lindsey Riter-Rapp

Darla Pollman Rogers
Robert D. Hofer, Of Counsel



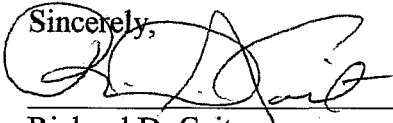
- (2) As to Interrogatory No. 8, SDTA continues to object to the Interrogatory, as presented, as being "overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence." The Interrogatory asks for an identification of "all of the telecommunications service offerings currently available to consumers residing within each SDTA member's South Dakota designated service area, including the price, calling area, and services included in each offering." (*Emphasis added*). To the extent that the Interrogatory seeks information related to telecommunications services that are not required to be offered by an ETC, it clearly seeks information not relevant to the questions presented for Commission decision in this proceeding. Without waiving our prior stated objections to Interrogatory No. 8, SDTA would offer to provide information to Cellco concerning the basic local service or "local usage plans" of five (5) SDTA member companies (the local service plans advertised by these companies). In addition, we will provide copies of the advertising materials used by these companies related to their basic local service offerings. SDTA would leave it to Cellco to select the five (5) companies that would provide this data/information.
- (3) With regard to Interrogatory No. 12, SDTA and Golden West continue to object to the Interrogatory on grounds that it is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving that objection, however, Golden West would agree to respond to Interrogatory No. 12. SDTA would agree to provide information identifying the subsidiaries and affiliates of each of the SDTA member companies (to the extent that those subsidiary and affiliate entities also operate in the State of South Dakota). This will include information generally describing the relationship that the subsidiary or affiliate has with the SDTA member company.

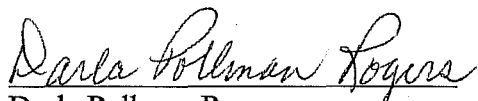
SDTA and Golden West would agree to provide this supplemental discovery response information as soon as possible.

We hope that the further explanations provided herein and the offers to provide additional information in response to the previously served Interrogatories and Requests for Production, will be sufficient to resolve the current discovery related disputes. If your client does not view these offers as being acceptable, please let us know promptly. Also, specifically, in regards to item (2) above, if the offer to provide the information from some, but not all of the SDTA member companies, is acceptable, SDTA will need your client to identify which of the SDTA member companies it would select to provide the described basic local service plan information.

In closing, we would like to express our thanks for your willingness to discuss and work through these issues.

Sincerely,


Richard D. Coit
General Counsel
SDTA


Darla Pollman Rogers
Attorney for Golden West and SDTA