

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA

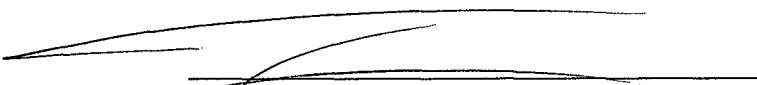
SOUTH DAKOTA NETWORK, LLC's) TC11-069
APPLICATON FOR WAIVER OF)
SWITCHED ACCESS COST STUDY)

SPRINT COMMUNICATIONS COMPANY L.P.'S MOTION TO COMPEL

Sprint Communications Company L.P. ("Sprint") by and through its attorneys, respectfully moves the Commission under A.R.S.D. 20:10:01:22.01, to issue an order compelling South Dakota Network, LLC ("SDN") to produce responses to Sprint's first set of discovery requests. Specifically, Sprint requests that SDN be compelled to provide complete and appropriate responses to Interrogatories Numbers 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, and 12 and Requests for Production Numbers 1 and 2. Such an order is appropriate because SDN failed to provide appropriate and complete responses to the aforementioned requests.

WHEREFORE, Sprint requests an order to compel be issued against SDN to provide complete and adequate responses to the above-referenced requests. This motion is based upon the documents and pleadings on file herein and upon the facts and authorities cited in Sprint's Memorandum in Support of Motion to Compel and Affidavit of Talbot J. Wiczorek incorporated herein by reference.

DATED this 2 day of October, 2012.


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CERTIFICATE OF SERVICE

I hereby certify that on the 12th day of October, 2012, I served a copy of Sprint's Motion to Compel electronically to:

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