

# **EXHIBIT**

# **RGF-4**

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

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IN THE MATTER OF THE APPLICATION  
OF NATIVE AMERICAN TELECOM, LLC  
FOR A CERTIFICATE OF AUTHORITY TO  
PROVIDE LOCAL EXCHANGE SERVICE  
WITHIN THE STUDY AREA OF  
MIDSTATE COMMUNICATIONS, INC.

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Docket No. TC11-087

**NATIVE AMERICAN TELECOM, LLC'S  
OBJECTIONS AND RESPONSES TO  
SPRINT COMMUNICATIONS COMPANY L.P.'S  
DISCOVERY REQUESTS**

Native American Telecom, LLC ("NAT") hereby submits its objections and responses to Sprint Communications Company L.P.'s ("Sprint") Discovery Requests.

**GENERAL OBJECTIONS**

NAT incorporates the following objections into each of its specific objections below.

1. NAT objects generally to each discovery request to the extent it seeks information protected by the attorney-client privilege, the attorney work product doctrine, common interest doctrine, joint defense privilege, or any other applicable privilege or right.
2. NAT objects generally to each discovery request to the extent it is overbroad and seeks information not relevant to the subject matter of this action or reasonably calculated to lead to the discovery of admissible

evidence, and to the extent that the requests are vague and ambiguous or unduly burdensome.

3. NAT objects generally to each discovery request insofar as it purports to require NAT to inquire of all of its current and former employees, agents and representatives to determine whether information responsive to the question exists on the grounds that such an inquiry would be unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. NAT will therefore limit its inquiry to the appropriate employees currently employed by NAT that have or have had responsibility for matters to which the discovery request relates.

4. NAT objects generally to each discovery request to the extent that the information requested is known to Sprint or its counsel, or to the extent they require disclosure of information, documents, writings, records or publications in the public domain, or to the extent the information requested is equally available to Sprint from sources other than NAT.

Please see NAT's specific objections and responses attached hereto.

Dated this 9<sup>th</sup> day of March, 2012.

SWIER LAW FIRM, PROF. LLC

/s/ Scott R. Swier

Scott R. Swier

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*Attorneys for NAT*

## **INTERROGATORIES**

**INTERROGATORY NO. 1:** Explain the customer relationships NAT intends to have covered by the certificate it seeks (i.e., provision of voice service to non-tribal members on the reservation; provision of voice service to tribal members on the reservation; provision of data service to non-tribal members on the reservation, etc.)

**RESPONSE/OBJECTIONS:** *Subject to and notwithstanding the aforementioned general objections, such information is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence in this Certificate for Authority matter. NAT also objects that the terms "customer relationship" and "intends to have covered" are vague, overbroad, and ambiguous. Without waiving said objections, NAT's states that NAT would intend to have all customer relationships covered by its certificate of authority as mentioned in Sprint's interrogatory.*

**INTERROGATORY NO. 2:** Identify and describe the services, goods, or products you have provided to Free Conferencing Corporation, including all features and practices associated with the provision of each service, the specific tariff or contract provision(s) pursuant to which each service, good, or product has been provided.

**RESPONSE/OBJECTIONS:** *Subject to and notwithstanding the aforementioned general objections, NAT also objects that the terms in this interrogatory (“services,” “goods,” “product”) are vague, overbroad, and ambiguous. Moreover, such information is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence in this Certificate for Authority matter.*

**INTERROGATORY NO. 3:** *Setting aside Free Conferencing Corporation, are all of those currently receiving voice service Tribal members? Explain how, during the application and provisioning process, you have identified whether individuals are Tribal members.*

**RESPONSE/OBJECTIONS:** *Subject to and notwithstanding the aforementioned general objections, such information is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence in this Certificate for Authority matter. NAT also objects that the term “Tribal member” is vague, overbroad and ambiguous. Without waiving said objections, NAT does not discriminate between its applicants for service. All services are provided to individuals and businesses located within the Reservation boundaries.*

**INTERROGATORY NO. 4:** How will NAT limit itself to providing service only on the Reservation given that it uses wireless signal that in some cases is capable of extending beyond Reservation boundaries?

**RESPONSE/OBJECTIONS:** *Subject to and notwithstanding the aforementioned general objections, such information is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence in this Certificate for Authority matter. Without waiving said objections, as far as NAT is aware, the signal's strength does not travel beyond Reservation boundaries. However, if Sprint would like to test this signal strength and Reservation boundaries, NAT will cooperate with Sprint to the extent this is relevant to this proceeding.*

**INTERROGATORY NO. 5:** In the federal court case between NAT and Sprint, Mr. Keith Williams testified on October 14, 2010 that calls to NAT numbers were switched by a Widevoice switch in Los Angeles, before being routed in IP back to NAT router in Ft. Thompson. October 14 Hearing Tr. Pp. 18-19. Is that true today? If so, where is that reflected in NAT's response to Staff Request 1-2. Regardless of switch location, provide detail (make, model, capacity, cost, date of purchase, ownership information, location) with respect to the switch now being used.

**RESPONSE/OBJECTIONS:** *Subject to and notwithstanding the aforementioned general objections, such information is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence in this Certificate for Authority matter.*

**INTERROGATORY NO. 6:** Describe the equipment to be used to provide NAT's Inbound Calling Service to those receiving it.

**RESPONSE/OBJECTIONS:** *Subject to and notwithstanding the aforementioned general objections, such information is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence in this Certificate for Authority matter.*

**INTERROGATORY NO. 7:** Identify the location of the cell towers and WiMax equipment you claim allows you to provide service throughout the reservation. Provide coverage maps that demonstrate the signals being generated can reach throughout the reservation.

**RESPONSE/OBJECTIONS:** *Subject to and notwithstanding the aforementioned general objections, such information is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence in this Certificate for Authority matter.*



**INTERROGATORY NO. 8:** Will NAT allow other carriers to establish IP-IP interconnection? On what terms?

**RESPONSE/OBJECTIONS:** *Subject to and notwithstanding the aforementioned general objections, such information is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence in this Certificate for Authority matter. Without waiving said objections, yes, the carrier must provide its own TDM transport to Fort Thompson, South Dakota.*

**INTERROGATORY NO. 9:** With respect to the voice services you have been providing, identify the taxes, assessments and surcharges that apply, including USF surcharges, TRS, and 911 assessments. Has NAT been collecting and/or remitting such amounts? If so, explain how amounts have been calculated, if not, why not? In doing so you should explain the calculations that resulted in NAT's remittance of \$10,665 to USAC for the 2012 calendar year.

**RESPONSE/OBJECTIONS:** *Subject to and notwithstanding the aforementioned general objections, such information is neither relevant nor*

*reasonably calculated to lead to the discovery of admissible evidence in this Certificate for Authority matter.*

**INTERROGATORY NO. 10:** You list "Communications Center" as an asset valued at \$99,241.61 on your December 31 2011 Balance Sheet. What makes up that category, and how did you determine the value of that asset?

**RESPONSE/OBJECTIONS:** *Subject to and notwithstanding the aforementioned general objections, such information is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence in this Certificate for Authority matter. Without waiving said objections, the value is at "cost basis."*

**INTERROGATORY NO. 11:** You list "Wi-Max Equipment" as an asset valued at \$216,086.81 on December 31 2011 Balance Sheet. What makes up that category, how did you determine the value of that asset, and what is its depreciation rate?

**RESPONSE/OBJECTIONS:** *Subject to and notwithstanding the aforementioned general objections, such information is neither relevant nor*

*reasonably calculated to lead to the discovery of admissible evidence in this Certificate for Authority matter.*

**INTERROGATORY NO. 12:** With respect to the "Marketing Expense" of \$170,097.75 listed on your 2011 Profit and Loss statement, please identify all of the expenses included in this line item, including amounts NAT paid to Free Conferencing Corporation.

**RESPONSE/OBJECTIONS:** *Subject to and notwithstanding the aforementioned general objections, such information is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence in this Certificate for Authority matter.*

**INTERROGATORY NO. 13:** With respect to the "Telephone and Circuit Expenses" of \$132,101 listed on your 2011 Profit and Loss, please identify the facilities covered by this line item, and identify the parties to whom you paid this expense and the amount paid to each party.

**RESPONSE/OBJECTIONS:** *Subject to and notwithstanding the aforementioned general objections, such information is neither relevant nor*

*reasonably calculated to lead to the discovery of admissible evidence in this Certificate for Authority matter.*

**INTERROGATORY NO. 14:** With respect to the "Professional Fees" of \$87,710 listed on your 2011 Profit and Loss, please identify the parties to whom you paid this expense, the services they provided, and the amount paid to each party.

**RESPONSE/OBJECTIONS:** *Subject to and notwithstanding the aforementioned general objections, such information is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence in this Certificate for Authority matter.*

**INTERROGATORY NO. 15:** With respect to the "End User Fee Income" of \$166,629 listed on your 2011 Profit and Loss, please describe all of the expenses included in this line item, identify the payment dates and amounts, and identify the payor(s).

**RESPONSE/OBJECTIONS:** *Subject to and notwithstanding the aforementioned general objections, such information is neither relevant nor*

*reasonably calculated to lead to the discovery of admissible evidence in this Certificate for Authority matter.*

**INTERROGATORY NO. 16:** With respect to the "Access Termination Fee Income" of \$91,814 listed on your 2011 Profit and Loss, please describe the sources of revenue within this account, and identify the payor(s) including the amount paid by each payor(s).

**RESPONSE/OBJECTIONS:** *Subject to and notwithstanding the aforementioned general objections, such information is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence in this Certificate for Authority matter.*

**INTERROGATORY NO. 17:** With respect to the "CABS Collection Fee Income" of \$157,983 listed on your 2011 Profit and Loss, please describe the sources of revenue within this account, and identify the payor(s) including the amount paid by each payor(s).

**RESPONSE/OBJECTIONS:** *Subject to and notwithstanding the aforementioned general objections, such information is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence in*

*this Certificate for Authority matter. Such information also constitutes confidential financial information and trade secrets.*

**INTERROGATORY NO. 18:** Explain from a technical standpoint how NAT proposes to provide intrastate interexchange service. Identify the rates and terms that will apply to the intrastate interexchange service NAT proposes to provide.

**RESPONSE/OBJECTIONS:** *Subject to and notwithstanding the aforementioned general objections, such information is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence in this Certificate for Authority matter. Without waiving said objection, a copy of NAT's tariff can be found at <http://nativeamericantelecom.com>. NAT's intrastate rates mirror interstate rates (even though NAT could legally charge more for intrastate service).*

**INTERROGATORY NO. 19:** Identify any factual information provided to Mr. Roesel by NAT or its representatives.

**RESPONSE/OBJECTIONS:** *Subject to and notwithstanding the aforementioned general objections, such information is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence in this Certificate for Authority matter. This interrogatory is also vague,*

*ambiguous, overbroad, and constitutes confidential financial and proprietary information and trade secrets.*

**INTERROGATORY NO. 20:** Identify the cases in which Mr. Roesel has testified or prefiled testimony over the last four years.

**RESPONSE/OBJECTIONS:** *Subject to and notwithstanding the aforementioned general objections, such information is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence in this Certificate for Authority matter.*

**INTERROGATORY NO. 21:** What documents has Mr. Roesel relied on to conclude NAT has the financial capability to provide the services covered by its application?

**RESPONSE/OBJECTIONS:** *Subject to and notwithstanding the aforementioned general objections, such information is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence in this Certificate for Authority matter. This interrogatory is also vague, ambiguous, overbroad, and constitutes confidential financial and proprietary information, and trade secrets.*

**INTERROGATORY NO. 22:** Identify by name the members of the Tribal Utility Authority who voted to approve NAT's application for authority to provide service on the Reservation.

**RESPONSE/OBJECTIONS:** *Subject to and notwithstanding the aforementioned general objections, such information is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence in this Certificate for Authority matter.*

**INTERROGATORY NO. 23:** What carriers besides MidState has NAT interconnected with for the exchange of telecommunications?

**RESPONSE/OBJECTIONS:** *Subject to and notwithstanding the aforementioned general objections, such information is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence in this Certificate for Authority matter. This interrogatory is also vague and ambiguous as to "interconnected with for the exchange of telecommunications" and requests proprietary information.*

**INTERROGATORY NO. 24:** Identify the manufacturer(s) of the WiMax technology NAT uses, including the model and serial numbers of each



piece of technology (hardware) NAT proposes to use to provide services under its Application.

**RESPONSE/OBJECTIONS:** *Subject to and notwithstanding the aforementioned general objections, such information is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence in this Certificate for Authority matter.*

**INTERROGATORY NO. 25:** What managerial and technical experience does NAT's management have in providing the telecom services proposed in its application? Where and over what period of time has NAT provided those services?

**RESPONSE/OBJECTIONS:** *See NAT's Application for Certificate of Authority and written testimony submitted by NAT.*

**INTERROGATORY NO. 26:** When did Tom Reiman stop serving as NAT's president?

**RESPONSE/OBJECTIONS:** *Subject to and notwithstanding the aforementioned general objections, such information is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence in this Certificate for Authority matter.*

**INTERROGATORY NO. 27:** Who maintains NAT's financial records?

Where are NAT's financial records kept?

**RESPONSE/OBJECTIONS:** *Subject to and notwithstanding the aforementioned general objections, such information is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence in this Certificate for Authority matter.*

**INTERROGATORY NO. 28:** Identify all of NAT's bank accounts.

**RESPONSE/OBJECTIONS:** *Subject to and notwithstanding the aforementioned general objections, such information is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence in this Certificate for Authority matter.*

**INTERROGATORY NO. 29:** Identify by name the employees and work locations of all of NAT's employees.

**RESPONSE/OBJECTIONS:** *Subject to and notwithstanding the aforementioned general objections, such information is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence in this Certificate for Authority matter.*

**INTERROGATORY NO. 30:** Identify the employees and officers of Free Conferencing who provide services to NAT or perform functions for NAT.

**RESPONSE/OBJECTIONS:** *Subject to and notwithstanding the aforementioned general objections, such information is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence in this Certificate for Authority matter.*

**INTERROGATORY NO. 31:** When did NAT first approach Free Conferencing to enter into a contract with NAT?

**RESPONSE/OBJECTIONS:** *Subject to and notwithstanding the aforementioned general objections, such information is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence in this Certificate for Authority matter.*

**INTERROGATORY NO. 32:** When did NAT open its stand-alone Internet Library and Training Facility?

**RESPONSE/OBJECTIONS:** *Subject to and notwithstanding the aforementioned general objections, such information is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence in*

*this Certificate for Authority matter.*

**INTERROGATORY NO. 33:** If NAT's revenues do not exceed expenses, where will NAT obtain the necessary resources to continue to provide high quality telecommunication services to its customers?

**RESPONSE/OBJECTIONS:** *Subject to and notwithstanding the aforementioned general objections, such information is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence in this Certificate for Authority matter. Without waiving said objections, NAT maintains that its revenues will exceed expenses. Also, following the Federal Communications Commission's recent USF/ICC Order, and consistent with this Order, more IXCs now recognize their legal duty to pay these tariffs and are doing so.*

**INTERROGATORY NO. 34:** Please provide all Business Plans you have prepared for the South Dakota market.

**RESPONSE/OBJECTIONS:** *Subject to and notwithstanding the aforementioned general objections, such information constitutes proprietary and trade secret information and is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence in this Certificate for Authority matter.*

**INTERROGATORY NO. 35:** NAT is 25% owned by Native American Telecom Enterprise, LLC. Please describe in detail the ownership and business activities of NAT Enterprise.

**RESPONSE/OBJECTIONS:** *Subject to and notwithstanding the aforementioned general objections, such information is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence in this Certificate for Authority matter. Without waiving said objections, Native American Telecom Enterprise, LLC ("NATE") is owned by Tom Reiman and Gene DeJordy and is engaged in bringing telecommunications services to remote areas, including Indian reservations.*

**INTERROGATORY NO. 36:** Please describe and identify, in detail, all cash transactions and payments from NAT to NAT Enterprise in 2010 and 2011. This should include, but not limited to, professional or consulting fees, interest payments, shareholder distributions, and percent of gross revenues per Section 6.06 of the Joint Venture Agreement.

**RESPONSE/OBJECTIONS:** *Subject to and notwithstanding the aforementioned general objections, such information is neither relevant nor*

*reasonably calculated to lead to the discovery of admissible evidence in this Certificate for Authority matter.*

**INTERROGATORY NO. 37:** NAT is 24% owned by Wide Voice Communications, Inc. Please describe in detail the ownership and business activities of Wide Voice.

**RESPONSE/OBJECTIONS:** *Subject to and notwithstanding the aforementioned general objections, such information is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence in this Certificate for Authority matter. Without waiving said objections, Wide Voice Communications, Inc. provides engineering and technical expertise to NAT.*

**INTERROGATORY NO. 38:** Please describe and identify, in detail, all cash transactions and payments from NAT to Wide Voice in 2010 and 2011. This should include, but not limited to, professional or consulting fees, interest payment, shareholder distributions, and percent of gross revenues per Section 6.06 of the Joint Venture Agreement.

**RESPONSE/OBJECTIONS:** *Subject to and notwithstanding the aforementioned general objections, such information is neither relevant nor*

*reasonably calculated to lead to the discovery of admissible evidence in this Certificate for Authority matter.*

**INTERROGATORY NO. 39:** As of year-end 2010 and 2011, please provide the number of:

- (a) Retail residential customers,
- (b) Retail traditional business customers (i.e., business customers with a physical presence in your service territory other than a NAT premises, with actual employees at that location,
- (c) Conference calling companies (e.g., Free Conference Call), and
- (d) Any other customers.

**RESPONSE/OBJECTIONS:** *Subject to and notwithstanding the aforementioned general objections, such information is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence in this Certificate for Authority matter. Without waiving said objections, Sprint has also already been provided with this information.*

**INTERROGATORY NO. 40:** As of year-end 2010 and 2011, please provide the number of:

- (a) Retail residential access lines,

- (b) Retail traditional business access lines (i.e., business customers with a physical presence in your service territory other than a NAT premises, with actual employees at that location.
- (c) Conference calling companies access lines (e.g., Free Conference Call), and
- (d) Any other access lines.

**RESPONSE/OBJECTIONS:** *Subject to and notwithstanding the aforementioned general objections, such information is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence in this Certificate for Authority matter.*

**INTERROGATORY NO. 41:** Please provide the number of NAT employees as of year-end 2010 and 2011.

**RESPONSE/OBJECTIONS:** *Subject to and notwithstanding the aforementioned general objections, such information is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence in this Certificate for Authority matter.*

**INTERROGATORY NO. 42:** Please provide an organization chart showing all NAT employees as of year-end 2011.

**RESPONSE/OBJECTIONS:** *Subject to and notwithstanding the*



*aforementioned general objections, such information is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence in this Certificate for Authority matter.*

**INTERROGATORY NO. 43:** Please provide a detailed diagram showing the call path through NAT-owned or controlled equipment for traffic terminating to any and all Conference Call Company-owned or controlled conference bridge equipment.

**RESPONSE/OBJECTIONS:** *Subject to and notwithstanding the aforementioned general objections, such information is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence in this Certificate for Authority matter.*

**INTERROGATORY NO. 44:** Please provide a detailed diagram showing the call path through NAT-owned or controlled equipment for traffic terminating to a traditional residential or business end-user (non-Conference Call Company).

**RESPONSE/OBJECTIONS:** *Subject to and notwithstanding the aforementioned general objections, such information is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence in*

*this Certificate for Authority matter.*

**REQUESTS FOR ADMISSIONS**

**REQUEST FOR ADMISSION NO. 1:** Admit that NAT needs a certificate to serve non-tribal members, even on the Reservation.

**ANSWER:** *Deny*

**REQUEST FOR ADMISSION NO. 2:** Admit that Free Conferencing Corporation is a non-tribal member.

**ANSWER:** *Admit*

**REQUEST FOR ADMISSION NO. 3:** Admit NAT is currently providing local exchange service within the Reservation.

**ANSWER:** *Admit*

**REQUEST FOR ADMISSION NO. 4:** Admit NAT is currently offering interexchange service within the Reservation.

**ANSWER:** *Admit*

**DOCUMENT REQUESTS**

**DOCUMENT REQUEST NO. 1:** Provide all documentation, including general ledger journal entries or other accounting records of NAT reflecting NAT's long term liabilities to Widevoice as listed on your December 31, 2011 Balance Sheet.

**RESPONSE/OBJECTIONS:** *Subject to and notwithstanding the aforementioned general objections, such information is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence in this Certificate for Authority matter.*

**DOCUMENT REQUEST NO. 2:** Provide any documents that evidence commitments for future financing of NAT's operations.

**RESPONSE/OBJECTIONS:** *Subject to and notwithstanding the aforementioned general objections, such information is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence in this Certificate for Authority matter.*

**DOCUMENT REQUEST NO. 3:** Provide 2011 bank statements, general ledger and journal entries and any other financial records that identify the detail for NAT's income and expenses.

**RESPONSE/OBJECTIONS:** *Subject to and notwithstanding the aforementioned general objections, such information is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence in this Certificate for Authority matter.*

**DOCUMENT REQUEST NO. 4:** Provide any documents (other than what was attached to the application, amended application, or responses to staff discovery requests) that were provided to Mr. Roesel.

**RESPONSE/OBJECTIONS:** *Subject to and notwithstanding the aforementioned general objections, such information is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence in this Certificate for Authority matter.*

**DOCUMENT REQUEST NO. 5:** Produce all documents that reflect NAT's Board of Directors' minutes, meetings, and resolutions, and NAT's bylaws.

**RESPONSE/OBJECTIONS:** *Subject to and notwithstanding the aforementioned general objections, such information is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence in this Certificate for Authority matter.*

**DOCUMENT REQUEST NO. 6:** Provide all documents reflecting NAT's contract with Free Conferencing.

**RESPONSE/OBJECTIONS:** *Subject to and notwithstanding the aforementioned general objections, such information is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence in this Certificate for Authority matter.*

**DOCUMENT REQUEST NO. 7:** Provide all general ledger journal entries or other accounting records of NAT that support NAT's balance sheets and profit and loss statements for 2009, 2010 and 2011.

**RESPONSE/OBJECTIONS:** *Subject to and notwithstanding the aforementioned general objections, such information is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence in this Certificate for Authority matter.*

**DOCUMENT REQUEST NO. 8:** Provide all documents reflecting NAT's loan from Widevoice.

**RESPONSE/OBJECTIONS:** *Subject to and notwithstanding the aforementioned general objections, such information is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence in this Certificate for Authority matter.*

**DOCUMENT REQUEST NO. 9:** Please provide any cost studies or similar analyses that you have performed or had prepared on your behalf by any consultant or other third party for access services and high volume access services.

**RESPONSE/OBJECTIONS:** *Subject to and notwithstanding the aforementioned general objections, such information is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence in this Certificate for Authority matter.*

**VERIFICATION**

I, *Jeff Holoubek*, state that I have first-hand knowledge of the matters set forth above and hereby verify that, to the best of my knowledge and belief, the allegations and statements contained herein are true and correct.

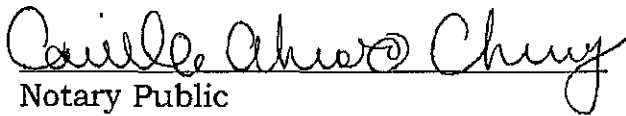
Dated this 9<sup>th</sup> day of March, 2012.



NATIVE AMERICAN TELECOM, LLC  
By: Jeff Holoubek  
Its: President

STATE OF CALIFORNIA     )  
COUNTY OF Los Angeles )

Subscribed and sworn to before  
me this 9 day of March, 2012.

  
Notary Public

My Commission Expires: 10-8-15

(SEAL)



**CERTIFICATE OF SERVICE**

I hereby certify that a true and accurate copy of *NATIVE AMERICAN TELECOM, LLC'S OBJECTIONS AND RESPONSES TO SPRINT COMMUNICATIONS COMPANY L.P.'S DISCOVERY REQUESTS* was delivered *via electronic mail* on this 9<sup>th</sup> day of March, 2012, to the following parties:

*Service List (SDPUC TC 11-087)*

*/s/ Scott R. Swier*  
Scott R. Swier