

EXHIBIT
RGF-3

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

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.

Docket No. TC11-087

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

Native American Telecom, LLC ("NAT") hereby submits its **SECOND SUPPLEMENTAL** 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 19th day of February, 2013.

SWIER LAW FIRM, PROF. LLC

/s/ Scott R. Swier

Scott R. Swier

202 N. Main Street

P.O. Box 256

Avon, South Dakota 57315

Telephone: (605) 286-3218

Facsimile: (605) 286-3219

scott@swierlaw.com

Attorneys for NAT

INTERROGATORIES

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.*

SECOND SUPPLEMENTAL RESPONSE/OBJECTIONS: *USF is calculated based on the number of end-users (on the reservation) and trunks provided multiplied by the USF contribution rate for each perspective quarter. NAT has been remitting USF since it crossed the de minimus threshold. In accordance with the FCC's rules, NAT remits all applicable taxes and surcharges. For USF, the calculations are based on the billed end-user revenue multiplied by the prospective USF contribution rate on a quarterly basis.*

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

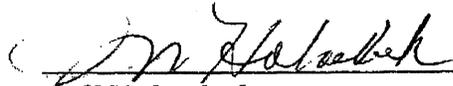
RESPONSE/OBJECTIONS: *Subject to and notwithstanding the aforementioned general objections, such information is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence in this Certificate for Authority matter.*

SECOND SUPPLEMENTAL RESPONSE/OBJECTIONS: *See "NAT's Response to Sprint's RFPD No. 6" (attached).*

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 15 day of February, 2013.

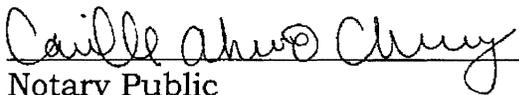


Jeff Holoubek

STATE OF CALIFORNIA)

COUNTY OF Los Angeles)

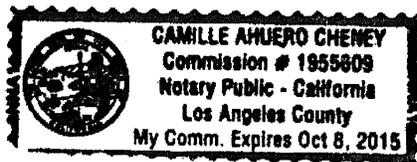
Subscribed and sworn to before
me this 15 day of February, 2013.



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 **SECOND SUPPLEMENTAL** OBJECTIONS AND RESPONSES TO SPRINT COMMUNICATIONS COMPANY L.P.'S DISCOVERY REQUESTS* was delivered *via electronic mail* on this *19th day of February, 2013*, to the following parties:

Service List (SDPUC TC 11-087)

/s/ Scott R. Swier
Scott R. Swier

**NAT'S RESPONSE TO SPRINT'S
RFPD NO. 6**

SDPUC TC 11-087

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