

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

In the Matter of the Petition of	)	
North American Local, LLC for	)	Docket No. TC19-009
Designation as an Eligible Telecommunications	)	
Carrier in the State of South Dakota	)	

**North American Local, LLC  
Responses To Discovery Requests of the South Dakota Telecommunications Association  
("SDTA")**

North American Local, LLC ("North American") hereby submits these initial responses to the Discovery Requests of the South Dakota Telecommunications Association ("SDTA").<sup>1</sup> North American will supplement these responses with further information in a supplemental filing no later than August 28, 2020.

The following responses correspond to the numbered Interrogatories 1 through 12 in SDTA's Discovery Requests (attached is a copy of SDTA's Discovery Requests):

**Interrogatory 1 Response:**

Jorge Bellas, Managing Partner  
13430 Gulf Beach Hwy, Ste. 79  
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Fax: (877) 372-2506  
[jbellas@northamericanlocal.com](mailto:jbellas@northamericanlocal.com)

**Interrogatory 2 Response:**

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[jbellas@northamericanlocal.com](mailto:jbellas@northamericanlocal.com)

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<sup>1</sup> On July 31, 2019, SDTA submitted Discovery Requests, but, due to various intervening events, North American has not been able to respond until now.

At this time, no documents have been reviewed for Jorge Bellas' testimony, except North American's ETC application filed in this proceeding.

**Interrogatory 3a Response:** North American is a facilities-based wireless reseller with its own network and back office facilities that relies on the wireless spectrum, cell towers and radio equipment of the large nationwide wireless carriers, like AT&T, Verizon, and T-Mobile.

**Interrogatory 3b Response:** See Response to Interrogatory 3a.

**Interrogatory 3c Response:** North American intends to serve all residents of the Tribal lands included in its request for ETC designation. Any potential customer is not satisfied with North American's coverage and service availability will have the ability to cancel service at no charge.

**Interrogatory 3d Response:** See Response to Interrogatory 3a. North American has agreements with AT&T, Verizon, and T-Mobile to resell services.

**Interrogatory 4a Response:** As a reseller of other facilities-based carriers' services, North American is able to provide consumers with the optimum coverage depending upon the underlying carrier's coverage and services that best meet customers' needs.

**Interrogatory 4b Response:** It is North American's understanding that ARSD § 20:10:32:43.01 is applicable to ETC applicants seeking high cost support used to extend network facilities to unserved areas. North American is seeking only Lifeline support to provide discounted service to qualified low-income consumers.

**Interrogatory 5 Response:** Upon ETC designation, North American will immediately make available Lifeline service to qualified low-income consumers throughout its ETC service area, subject to any applicable regulatory requirements or conditions of ETC designation.

**Interrogatory 6 Response:** See Supplemental Response to be provided on or before August 28, 2020.

**Interrogatory 7 Response:** North American's Lifeline service offerings will meet all applicable regulatory requirements, including the minimum service standards established by the Federal Communications Commission ("FCC").

**Interrogatory 8 Response:** The minimum monthly data usage standard established in 47 C.F.R. § 54.408 is an evolving standard set periodically by the FCC. North American meets this standard in its Lifeline service markets and will continue to meet this standard in South Dakota and all other Lifeline markets.

**Interrogatory 9 Response:** See Supplemental Response to be provided on or before August 28, 2020.

**Interrogatory 10 Response:** See Supplemental Response to be provided on or before August 28, 2020.

**Interrogatory 11 Response:** See Supplemental Response to be provided on or before August 28, 2020.

**Interrogatory 12 Response:** See Supplemental Response to be provided on or before August 28, 2020.

Dated: August 21, 2020

Respectfully submitted,

**North American Local, LLC**

*Gene DeJordy*

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## Certificate of Service

I hereby certify that a copy of these Responses To SDTA's Discovery Requests was filed with the South Dakota Public Utilities Commission and served on the following individuals by email on August 21, 2020:

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