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

IN THE MATTER OF THE
APPLICATION OF LTD BROADBAND
LLC FOR DESIGNATION AS AN
ELIGIBLE TELECOMMUNICATIONS
CARRIER FOR PURPOSES OF
RECEIVING FEDERAL UNIVERSAL
SERVICE SUPPORT

**MOTION TO COMPEL DISCOVERY
AND
SDCL 15-6-37(a)(2) CERTIFICATION**

Docket No. TC21-001

Pursuant to ARSD 20:10:01:22.01 and SDCL 16-6-37(a), South Dakota Telecommunications Association (SDTA) hereby moves for an Order to compel Petitioner LTD Broadband (LTD) to respond to discovery requests. Specifically, SDTA moves for production of Discovery Request 1-1, 1-10, 1-11, 1-12 and 1-13. This Motion is supported by a corresponding brief.

Pursuant to SDCL 15-6-37(a) SDTA, through its counsel, Kara Semmler certifies that it did, in good faith attempt to confer with counsel for LTD to secure the information and materials without Commission action. Such attempts were unsuccessful, and this Motion is necessary.

DATED this 27 day of August, 2021.



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