

---

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

---

**IN THE MATTER OF THE  
APPLICATION OF LTE WIRELESS,  
INC. FOR DESIGNATION AS AN  
ELIGIBLE TELECOMMUNICATIONS  
CARRIER IN THE STATE OF SOUTH  
DAKOTA**

**Docket No. TC25-038**

---

**FIRST DISCOVERY REQUESTS OF SOUTH DAKOTA  
TELECOMMUNICATIONS ASSOCIATION (SDTA) TO LTE WIRELESS, INC.**

The South Dakota Telecommunications Association (“SDTA”) hereby serves its First Discovery Request on LTE Wireless, Inc (“LTE”). You are requested and required to answer fully and under oath, pursuant to S.D. Admin. R. 20:10:01:22.01, each of the following Discovery Requests and serve a copy of your answers and responses thereto upon Kara Semmler, General Counsel for SDTA, on or before January 22, 2026. Please be advised that your answers must include all information available not only to you, but to your agents, officers, representatives, employees, attorneys, insurers, or others who have information available to you upon inquiry to them.

**DEFINITIONS AND INSTRUCTIONS**

**A. DEFINITIONS**

As used herein, the following terms have the meaning as set forth below:

1. The term “you” refers to “LTE Wireless, Inc.” or “LTE”.
2. The terms “document” or “documents” as used herein shall include, without limitation, any writings and documentary material of any kind whatsoever, both originals and copies (regardless of origin and whether or not including additional writing thereon or attached thereto), and any and all drafts, preliminary versions, alterations, modifications, revisions, changes and written comments of and concerning such material, including but not limited to: correspondence, letters, memoranda, notes, reports, directions, studies, investigations, questionnaires and surveys, inspections, permits, citizen complaints, papers, files, books, manuals, instructions, records, pamphlets, forms, contracts, contract amendments or supplements, contract offers, tenders, acceptances, counteroffers or negotiating agreements, notices, confirmations, telegrams, communications sent or received, print-outs, diary entries, calendars, tables, compilations, tabulations, charts, graphs, maps, recommendations, ledgers, accounts, worksheets,

photographs, tape recordings, movie pictures, videotapes, transcripts, logs, workpapers, minutes, summaries, notations and records of any sort (printed, recorded or otherwise) of any oral communication whether sent or received, and other written or electronic records or recordings, in whatever form, stored or contained in or on whatever medium including computerized or digital memory or magnetic media that: (a) are now or were formerly in your possession, custody or control; or (b) are known or believed to be responsive to these interrogatories, regardless of who has or formerly had custody, possession or control.

3. The term “including” means “including, but not limited to.”

## **B. INSTRUCTIONS**

1. If you maintain that any document or record that would be responsive to any of the data requests has been destroyed, set forth the content of said document, the location of any copies of said document, the date and circumstances of said destruction, and the name of the person who ordered or authorized such destruction.
2. In answering these data requests, furnish all responsive documents in your possession or in the possession of any of your directors, officers, employees, agents, representatives, or attorneys.
3. If you cannot answer a data request in full after exercising due diligence to secure all the information requested, or does not have precise information with regard to any part of a data request, so state in the response, describing in full the efforts to obtain the information requested, and then proceed to respond to the fullest extent possible. If an objection is made to any part of a data request, answer all parts of the data request to which you do not object, and as to each part to which you do object, separately set forth the specific basis for the objection.
4. If a responsive document is considered to contain confidential, proprietary, or otherwise protected information, please furnish this document subject to a protective agreement.
5. If any information is withheld under a claim of privilege, please describe the information without revealing the asserted privileged information, and provide a statement of the basis upon which the claim of privilege is based.
6. If any of the information requested by a data request varies over time, state the response for each period of time as to which the response differs, and identify the time periods.

7. These interrogatories and requests are considered continuing and should be supplemented as additional information becomes available.

### **INTERROGATORIES AND REQUEST FOR DOCUMENTS**

**REQUEST 1:** For each Request, identify each person who assisted in the preparation of these responses or who provided information for the purpose of preparing these responses.

**REQUEST 2:** Provide the name and contact information for LTE’s attorney.

**REQUEST 3:** List all states where LTE currently provides services.

- a. List the number of customers in each state.
- b. Specify whether LTE provides service in tribal areas in each listed state.

**REQUEST 4:** List all states in which LTE has ETC designation.

- a. For each state, list the total number of Lifeline customers?

**REQUEST 5:** List all states in which LTE has a pending application for ETC designation .

**REQUEST 6:** Provide a list of all company officers and managing personnel along with a description of his or her professional experience.

**REQUEST 7:** List, identify, and describe all LTE owned facilities in South Dakota.

**REQUEST 8:** Provide a diagram of LTE’s “network infrastructure” referred to in Section III of its application.

**REQUEST 9:** Does LTE own facilities in other states? If so, describe the facilities and specify the state in which it is located.

**REQUEST 10:** Has LTE or any of the individuals listed in Request 6 been named as a party to any regulatory proceeding (state or federal) other than applications for ETC designation? If so, provide the case name, number and jurisdiction.

**REQUEST 11:** Provide a detailed map of the requested service area, by wire center.

**REQUEST 12:** Does LTE have a website? If so, provide it.

**REQUEST 13:** What are the monthly plans that LTE proposes to offer to Lifeline customers in SD? Specify voice minutes, data allowance, all other features offered with the plan and price.

**REQUEST 14:** Provide a copy of the Terms and Conditions that customers must agree to prior to taking service.

**REQUEST 15:** Are Lifeline customers provided with a phone?

- a. If so, is there a cost to the consumer? If so, specify.
- b. What type of phones are offered?
- c. Are the phones new or refurbished?

**REQUEST 16:** Explain how LTE handles consumer complaints.

**REQUEST 17:** Does LTE charge a fee or penalty if a customer cancels service?

**REQUEST 18:** Does LTE anticipate geography areas in South Dakota wherein customers may experience service issues due to inadequate service coverage?

DATED this 22 day of December, 2025.

/s/ Kara Semmler

---

Kara Semmler  
General Counsel  
South Dakota Telecommunications Assn.  
320 East Capitol Ave.  
P.O. Box 57  
Pierre, SD 57501

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the First Discovery Requests by SDTA to LTE, dated December 22, 2025, was electronically served upon the following parties to PUC docket TC25-038:

Ms. Leah Mohr Executive Director South Dakota Public Utilities Commission <a href="mailto:Leah.Mohr@state.sd.us">Leah.Mohr@state.sd.us</a>	Mr. Logan Schaeffbauer Staff Attorney South Dakota Public Utilities Commission <a href="mailto:Logan.Schaeffbauer@state.sd.us">Logan.Schaeffbauer@state.sd.us</a>
Mr. Faizal Hassad Manager LTE Wireless, Inc <a href="mailto:regulatory@ltewireless.com">regulatory@ltewireless.com</a>	

Dated this 22 day of December, 2025.

/s/ Kara Semmler

---

Kara C. Semmler, General Counsel  
South Dakota Telecommunications  
Association  
PO Box 57  
320 East Capitol Avenue  
Pierre, SD 57501-0057