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September 13, 2006

VIA NEXT DAY DÉLIVERY

Ms. Hillary Brady Office of Hearing Examiners 210 East 4th Street Pierre SD 57501

ŔΕ:

In the Matter of the Petitions of Golden West companies for Arbitration Pursuant to the Telecommunications Act of 1996 to Resolve Issues relation to Interconnection with WWC License, L.L.C. - Arbitration consolidation SDPUC Docket File Numbers TC 06-036 thru TC 06-042 OHE File PUC 6-06 GPGN File No. 5925.060285

Dear Ms. Brady:

Enclosed you will find a Motion to Compel and accompanying brief. The brief explains the specific items we are seeking to compel. We initially attempted to clarify some of these issues with opposing counsel, but opposing counsel is of the position that any discussion on discovery issues is now untimely. As explained in the brief, we disagree with this analysis.

At this time. I propose we discuss this motion at the hearing set next Tuesday to hear the other pending motions. At that time, a consideration may be to schedule another time to fully argue the discovery motion either later next week or the first of the week following as exchange of initial testimony on the 20th may resolve questions surrounding some of the discovery requests. The requirements you have placed upon the parties to provide information in an unprotected format could answer some of the questions that were previously not fully responded to by the Golden West Companies.

If you need anything else, please let me know.

Sincerely,

Talbot J. Wieczorek

TJW:ckk Enclosures

Clients (via email)

Meredith Moore (via email)

Paul Schudel (via email) Rich Coit (via email)

Rolayne Wiest (via email)

Kara Vanbockern (via email)

Doc# 404730v1, 5925-060285



BEFORE THE SOUTH DAKOTA

OFFICE OF HEARING EXAMINERS

In the Matter of the Petitions of Armour Independent	Docket Nos.
Telephone Company, Bridgewater-Canistota Telephone	
Company, Golden West Telecommunications)	TC06-036
Cooperative, Inc., Kadoka Telephone Company, Sioux	TC06-037
Valley Telephone Company, Union Telephone	TC06-038
Company, and Vivian Telephone Company (collectively	TC06-039
the "Golden West Companies") for Arbitration Pursuant	TC06-040
to the Telecommunications Act of 1996 to Resolve	TC06-041
Issues Relating to Interconnection Agreements with	TC06-042
WWC License L.L.C. ("Western Wireless").	

WWC LICENSE L.L.C.'s MOTION TO COMPEL

COMES NOW, the above-named WWC License, L.L.C., by and through its counsel of record, Talbot J. Wieczorek of Gunderson, Palmer, Goodsell, & Nelson, LLP, and Stephen B. Rowell of Alltel Communications, Inc., hereby files this Motion to Compel discovery from the Golden West Companies requiring the Golden West Companies completely answer interrogatories propounded to Plaintiffs as part of discovery. This motion is based on the following reasons:

- 1. WWC served written interrogatories on the Golden West Companies and Plaintiffs have failed to answer some of the interrogatories or provided incomplete answers;
- 2. Some of the interrogatories served on the Golden West Companies were objected to and the objections are without merit;
- 3. The specific interrogatories WWC is seeking to compel answers on are outlined in the attached brief and the analysis of why the information is relevant and discoverable is set forth;
- 4. This motion is timely as there has been no deadline set for the filing of motions, the Golden West Companies led WWC to believe that they would require determination of Golden West motions be decided before filing testimony and based on these representations, Western Wireless had not previously filed a motion to compel;

5. This motion is based on the brief accompanying the motion and the record in the above-entitled matter.

Dated this 13 day of September, 2006.

Attorneys for Alltel Communications, Inc. WWC License LLC:

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Stephen B. Rowell Alltel Communications, Inc. One Allied Drive Little Rock, Arkansas 72202

CERTIFICATE OF SERVICE

I hereby certify that on the <u>description</u> day of September, 2006, I sent electronically and by first-class mail, postage prepaid, a true and correct copy Western Wireless's MOTION TO COMPEL to:

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