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January 6, 2006

Patricia Van Gerpen
Executive Director
SD Public Utilities Commission
500 E Capitol Avenue
Pierre SD 57501

RECEIVED

JAN 09 2006

SOUTH DAKOTA PUBLIC
UTILITIES COMMISSION

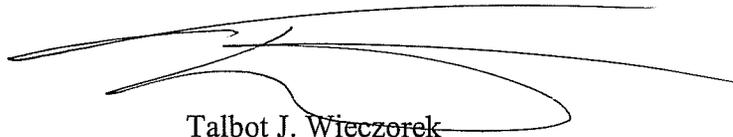
RE: WWC's Complaint against Golden West Companies Regarding
Intercarrier Billings
Docket CT 05-001 GPGN File No. 5925.050089

Dear Ms. Van Gerpen:

Enclosed please for filing, please find the original and ten copies of WWC's Motion to Compel Production of Discovery Responses and Brief in Support of WWC's Motion to Compel Production of Discovery Responses, along with the Certificate of Service.

Please feel free to contact me with any questions.

Sincerely,



Talbot J. Wieczorek

TJW:klw
Enclosures
c: (w Encl)

Darla Pollman Rogers
Rich Coit
Rolayne Wiest
Client

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA

RECEIVED

JAN 09 2006

SOUTH DAKOTA PUBLIC
UTILITIES COMMISSION

IN THE MATTER OF THE COMPLAINT
OF WWC LICENSE LLC AGAINST
GOLDEN WEST TELECOMMUNICA-
TIONS COOPERATIVE, INC.; VIVIAN
TELEPHONE COMPANY; SIOUX VAL-
LEY TELEPHONE COMPANY; UNION
TELEPHONE COMPANY; ARMOUR
INDEPENDENT TELEPHONE COM-
PANY; BRIDGEWATER-CANISTOTA
INDEPENDENT TELEPHONE COM-
PANY; AND KADOKA TELEPHONE
COMPANY

DOCKET NO. CT05-001

WWC'S MOTION TO COMPEL
PRODUCTION OF DISCOVERY
RESPONSES

WWC License LLC, of 3650 131st Avenue SE, Suite 400, Bellevue, Washington 98006, a subsidiary of Alltel (hereinafter "WWC"), by and through its attorney, Talbot J. Wieczorek, of Gunderson, Palmer, Goodsell & Nelson, LLP, respectfully moves the Commission under A.R.S.D. 20:10:01:22.01 to issue an order compelling respondents to produce information in response to WWC's third set of discovery requests, specifically Interrogatory Numbers 35 and 37.

Respondents provided responses to WWC's Third Set of Discovery Requests on October 28, 2005; however, respondents did not adequately or completely respond to Requests for Production Number 35 and Number 37. In response to Interrogatory Number 35, the Golden West companies failed to explain how they calculated interstate charges. Rather Golden West simply gave one example and then asserted the same rate should be applied at every company even though the companies have different rates. As to Interrogatory Number 37, Golden West

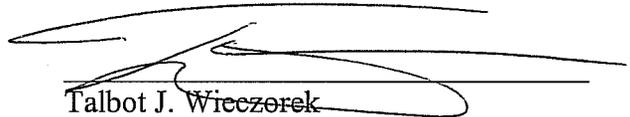
companies failed to provide passwords to unlock their spreadsheets so a full analysis could be completed of their spreadsheets by WWC.

WHEREFORE, WWC requests an Order to Compel be issued against the Golden West companies to provide complete and adequate responses to the above-referenced Interrogatories.

This motion is based upon the documents and pleadings on file herein and upon the facts and authorities cited in WWC's Brief in Support of Motion to Compel Discovery Responses, attached hereto and incorporated herein by reference.

Dated this 6 day of January, 2006.

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