

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

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In the Matter of the Application of Native	)	
American Telecom, LLC for a Certificate of	)	
Authority to Provide Local Exchange Service	)	Docket No. TC11-087
within the Study Area of Midstate	)	
Communications, Inc.	)	

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**AFFIDAVIT OF TODD L. LUNDY IN SUPPORT OF CENTURYLINK'S RESPONSE TO NAT'S MOTION  
TO COMPEL DISCOVERY**

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Todd L. Lundy, being duly sworn, states as follows:

1. I am employed by CenturyLink as Associate General Counsel, and as such, represent CenturyLink in the above-captioned docket.
2. I submit this affidavit in conjunction with CenturyLink's Response to NAT's Motion to Compel Discovery, and in particular, to verify the communications between counsel with regard to NAT's discovery requests.
3. On Friday, February 24, 2012, I authored and sent to NAT's counsel the email attached to CenturyLink's Response as Exhibit 1.
4. On Monday, February 27, 2012, I authored and sent to NAT's counsel the email attached to CenturyLink's Response as Exhibit 2.
5. On Wednesday, February 29, 2012, counsel for the parties conducted a conference call to discuss NAT's discovery requests to CenturyLink. Counsel for NAT addressed the six data requests and the six document requests quoted and referenced in CenturyLink's Response. NAT's counsel asserted two bases for those requests: first, Sprint had asked those questions of NAT, and so, if NAT had to answer them, then so must the other parties. Second, NAT stated that the requests were relevant to the issue of "competition."

6. Since CenturyLink served its responses to NAT's discovery requests on March 9, 2012, counsel for CenturyLink has not received any communication from NAT's counsel with regard to CenturyLink's discovery responses.

Further, the affiant sayeth naught.

Todd Leundy

Subscribed and sworn to before me this 13<sup>th</sup> day of April, 2012.

Carl H. [Signature]

Notary Public

My Commission Expires: 3-3-2015

