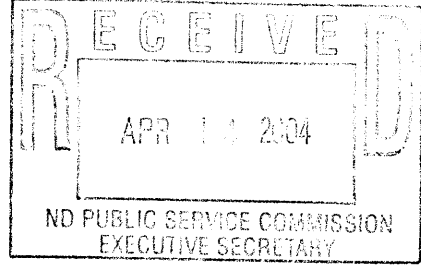


BEFORE THE PUBLIC SERVICE COMMISSION OF NORTH DAKOTA

BEK Communications Cooperative,)
Consolidated Telcom, Dakota Central)
Telecommunications Cooperative, Dickey)
Rural Telephone Cooperative, Griggs)
County Telephone Company, Inter-Community)
Telephone Company, LLC, Missouri Valley)
Communications, Inc., Moore and Liberty)
Telephone Company, Nemont Telephone)
Cooperative, Inc., North Dakota Telephone)
Company, Northwest Communications)
Cooperative, Polar Communications Mutual)
Aid Corporation, and Reservation Telephone)
Cooperative,)
Complainants,)
vs.)
SmartNET, Inc., d/b/a CallSmart,)
Respondent.)



Case No. PU-2967-03-666

**MOTION FOR PRODUCTION
AND SANCTIONS**

This motion is made by the above-named Complainants pursuant to the North Dakota Public Service Commissions's (the Commission) appointment of the North Dakota Office of Administrative Hearings as the Administrative Hearing Officer for purposes of the procedural matters in this case.

Complainants request the following relief:

1. An Order from the Administrative Law Judge that the Respondent immediately provide to the Complainants (a) a copy of all current contracts with any other telecommunications carriers, including Internet Service Providers and companies to which the Respondent terminates telecommunications traffic, (b) a complete list of equipment and

facilities utilized by the Respondent in operating its system, and (c) a certificate that all other discovery that has been requested has been provided or does not exist;

2. An Order that, unless the documentation is immediately provided, the Respondent be found in contempt for violating orders to produce and in violation of North Dakota telecommunications laws and grant the Complainants the relief requested in the Complaint; and

3. Such other relief as may be called for.

4. Moving papers and a Brief filed on March 18, 2004, hereby incorporated by reference.

Dated this 13th day of April, 2004.

PRINGLE & HERIGSTAD, P.C.



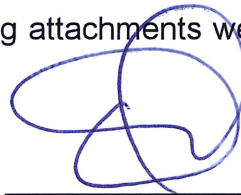
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Telephone: (701) 852-0381
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pringle@ndak.net
Attorney for Complainants

CERTIFICATE OF SERVICE

A true and correct copy of the foregoing Motion for Production and Sanctions was served by mail on the 13th day of April, 2004, on the following:

Bruce A. Selinger
KUBIK, BOGNER, RIDL & SELINGER
26 East Third Street
P.O. Box 1173
Dickinson, ND 58602-1173

A copy of the Brief and other supporting attachments were mailed to the above person on March 18, 2004.



Don Negaard, ND Bar ID #03598