

LAW OFFICES
MAY, ADAM, GERDES & THOMPSON LLP
503 SOUTH PIERRE STREET
P.O. BOX 160
PIERRE, SOUTH DAKOTA 57501-0160

DAVID A. GERDES
CHARLES M. THOMPSON
ROBERT B. ANDERSON
BRENT A. WILBUR
TIMOTHY M. ENGEL
MICHAEL F. SHAW
NEIL FULTON
BRETT KOENECKE
CHRISTINA L. FISCHER

SINCE 1881
www.magt.com

OF COUNSEL
WARREN W. MAY
THOMAS C. ADAM
GLENN W. MARTENS 1881-1963
KARL GOLDSMITH 1885-1966
TELEPHONE
605 224-8803
TELECOPIER
605 224-6289

Celebrating 125 Years

February 3, 2006

e-mail
koenecke@magt.com

Patricia Van Gerpen
Executive Director
Public Utilities Commission
500 East Capitol Ave
Pierre SD 57501

RECEIVED

FEB 06 2006

**SOUTH DAKOTA PUBLIC
UTILITIES COMMISSION**

RE: RMO5-002

Written Comments on Potential Revisions to the Commission's Switched Access Rules
Codified in ARSD 20:10:27 through 20:10:29

Dear Ms. Van Gerpen:

MCImetro Access Transmission Services, LLC dba Verizon Access Transmission Services and MCI Communications Services, Inc. dba Verizon Business (hereinafter referred to collectively as "Verizon Business") submit these initial comments regarding potential revisions to the Commission's Switched Access Rules codified in ARSD 20:10:27 through 20:10:29.

Verizon Business will likely file more detailed comments with the Commission and otherwise actively participate in this docket. Verizon Business operates as both a local exchange carrier and interexchange carrier, providing services in South Dakota. Verizon Business and its customers have a direct interest in the outcome of this rule making docket. As a local exchange carrier and long distance provider, Verizon Business is subject to the payment of switched access charges in order to provide its customers services in the state, and the level of those payments can affect the prices Verizon Business charges its customers. The prescribed manner in which intrastate access rates are set directly affects the cost of toll services provided to and paid by the customers of Verizon Business and the public in the State of South Dakota.

Since the current rules were written, both intramodal and intermodal competition has grown substantially in South Dakota. The Federal Communications Commission is also reviewing intercarrier compensation at this time and has recognized that the rates for switched access service must be reviewed in view of extensive competition and varying rates paid for equivalent wholesale services by providers using different technologies.

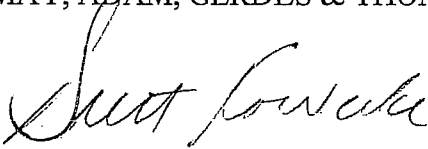
Patricia Van Gerpen
February 3, 2006
Page 2 of 2

The rules as they exist have resulted in very high instate switched access rates for many of South Dakota's independent rural telephone companies, whose rates generally significantly exceed the rates charged for the same services provided by Qwest Corporation.

Accordingly, MCImetro Access Transmission Services, LLC dba Verizon Access Transmission Services and MCI Communications Services, Inc. dba Verizon Business advise the Commission that they will participate, and reserve the right to file future comments, reply comments, and otherwise actively participate in this docket.

Very truly yours,

MAY, ADAM, GERDES & THOMPSON LLP

A handwritten signature in cursive script, appearing to read "Brett Koenecke".

BRETT KOENECKE

BK:skk