

DOCKET NO.

In the Matter of _____

**IN THE MATTER OF THE FILING BY
KENNEBEC TELEPHONE COMPANY
FOR APPROVAL OF DIALING PARITY
IMPLEMENTATION PLAN AND
PETITION FOR SUSPENSION AND
MODIFICATION OF DIALING PARITY**

Public Utilities Commission of the State of South Dakota

DATE	MEMORANDA
4/21 99	Filed and Docketed;
4/23 99	Wakely Filings;
5/17 99	Staff Comments on IntraATA, Inc. Dialing Parity Plans;
5/17 99	Response of OFTC to Staff Comments;
6/22 99	Order Granting Petition for Suspension and Modification;
6/22 99	Order Approving Dialing Parity Implementation Plan;
6/22 99	Docket Closed.

909 N. 98th Street, Suite 203
Omaha, NE 68114-2508
(402) 398-0052 FAX (402) 398-0055301 S. 13th Street, Suite 401
Lincoln, NE 68508
(402) 441-4315 FAX (402) 441-4317P.O. Box 858, 1508 Sylvan Circle
Brandon, SD 57005-0858
(605) 582-2020 FAX (605) 582-2021

April 20, 1999

Mr. Bill Bullard, Executive Director
South Dakota Public Utilities Commission
State Capitol Building
500 East Capitol Avenue
Pierre, South Dakota 57501**RECEIVED**

APR 21 1999

RE: Docket TC99-030/Implementation Plan for IntraLATA Dialing Parity

SOUTH DAKOTA PUBLIC
UTILITIES COMMISSION

Dear Mr. Bullard:

On behalf of our client, Kennebec Telephone Company (Kennebec), we are enclosing its intraLATA toll dialing parity implementation plan for filing in the above referenced docket and, pursuant to South Dakota Public Utilities Commission rule 20:10:32:39 and 47 U.S.C. 251 (F)(2), a petition for suspension and modification of the requirement for implementing intraLATA dialing parity until September 19, 1999.

The FCC, in FCC 99-54, released March 23, 1999, issued a "compressed schedule" (the FCC's words), for local exchange carriers (LECs) to implement intraLATA dialing parity. The Telecommunications Act of 1996 provides for the suspension and modification of the application of a requirement in Section 252, subsection (b) or (c) for LECs "with fewer than two percent of the Nation's subscriber lines installed in the aggregate nationwide." Said LECs, in petitioning their state commission(s), must demonstrate that such suspension and modification "(A) is necessary - (i) to avoid a significant adverse economic impact on users of telecommunications services generally; (ii) to avoid imposing a requirement that is unduly economically burdensome; or (iii) to avoid imposing a requirement that is technically infeasible; and (B) is consistent with the public interest, convenience, and necessity. Kennebec Telephone Company is a local exchange carrier (LEC) with approximately 800 access lines which is fewer than two percent of the nation's subscriber lines installed in the aggregate nationwide. Kennebec's implementation of intraLATA dialing parity in Kennebec and Presho are part and parcel of its implementation of interLATA dialing parity in its Kennebec exchange and the centralizing of both intraLATA and interLATA equal access for the Kennebec and Presho exchanges at the SDN switch at Sioux Falls. Because this effort is more extensive than just implementing intraLATA dialing parity, the implementation time line is significant. The implementation of Kennebec's plan actually began before the FCC released its order, FCC 99-54. At this point, Kennebec has no choice but to follow the time-line detailed in its plan. To try to alter the plan already in process would be unduly economically burdensome, technically infeasible, and certainly not consistent with the public interest. Therefore, Kennebec Telephone Company seeks the suspension and modification to allow intraLATA dialing parity to be implemented according to the plan already in process.

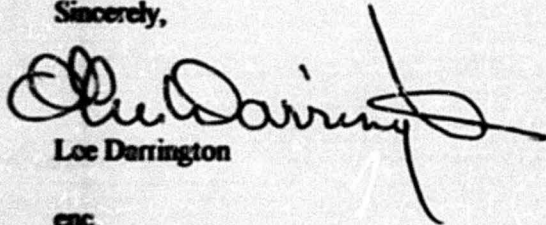
We are submitting Kennebec's centralized equal access plan that was prepared by Mid America Computer Corporation (MACC). MACC is also currently implementing parts of the plan.

Included in Kennebec's plan is a description of the offering, conversion details, carrier notifications, customer ballots, and a time-line.

Please give Loretta Calabro or me a call at (402)398-0062 with any questions you may have on either the petition or implementation plan.

Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Lee Darrington", with a long, sweeping horizontal stroke extending to the right.

Lee Darrington

enc.

cc: Rod Bowar, Kennebec Telephone Company

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INTRODUCTION

This Equal Access Carrier Manual is a guide to all long distance companies who wish to obtain equal access (FG-D) from conforming telephone offices.

This package contains the necessary instructions, time frames, and forms for participation in an equal access conversion.

It is the telephone company's intent to work closely with all users of access and maintain an impartial position with regard to the end user customer's selecting of a long distance company.

The telephone company has obtained the services of Mid America Computer Corporation to perform its pre-subscription and balloting process.

The forms contained in this package are to be removed and used for actual information transmittal as needed. The telephone company recommends duplicating each form for actual use and maintaining a complete Equal Access Carrier Manual for future reference.

EQUAL ACCESS COORDINATOR (EAC)

All phases of the Equal Access process will be administered through an Equal Access Coordinator (EAC).

All inquiries relative to pre-conversion, conversion, and post-conversion should be directed toward the EAC's.

BALLOTS/REPORTS/PRECONVERSION

Name:	Karen Comstock
Title:	Equal Access Support Representative
Company:	MidAmerica Computer Corp.
Address:	111 Admiral Dr., P.O. Box 400
City, State, Zip:	Blair, NE 68008
Telephone:	(402) 426-6222
Fax:	(402) 533-5394

B&C/TECHNICAL/POST-CONVERSION

Name:	Rod Bowar
Title:	Manager
Company:	Kennebec Telephone Company
Address:	100 S. Main Street
City, State, Zip:	Kennebec, SD 57544
Telephone:	(605) 869-2220
Fax:	(605) 869-2221

Kennebec TELEPHONE COMPANY
CONVERTING OFFICES FOR INTER & INTRA EQUAL ACCESS

Telephone Company Name:	Kennebec Telephone Company		
Exchange Central Office Location:	Kennebec, SD		
NPA:	605		
Converting NXX:	869		
Conversion Date:	September 19, 1999		
Total Converting Access Lines:	Kennebec:	Total:	297
		Business:	96
		Residence:	201
V & H Coordinates:	Kennebec:	V = 6384	H = 5390
Lata:	640		
RAO:	138		
Company Code (ECIC):	1668		
Tandem/CLLI Code:	SXFLSDCH01T		

KENNEBEC TELEPHONE COMPANY
Equal Access Conversion Timeline

<u>DAYS PRIOR TO CONVERSION</u>	<u>DATE</u>	<u>ACTIVITY</u>
-180	March 22, 1999	MACC notifies long distance carriers of telephone company's intent to convert to equal access.
-120	May 21, 1999	Long distance company must place firm order to be eligible to be on the equal access ballot.
-117	May 25, 1999	Sample ballot sent to participating long distance carriers for approval.
-107	June 4, 1999	Sample ballot changes deadline.
-90	June 22, 1999	MACC sends first equal access ballots to end users.
-70	July 12, 1999	MACC sends first report of customers to long distance carriers.
-60	July 21, 1999	First equal access ballot deadline. Allocation percentages are figured. Tentative allocation performed.
-40	August 10, 1999	Second equal access ballot mailed. MACC sends second report of customers to long distance carriers.
-20	August 30, 1999	Second equal access ballot deadline.
-10	September 9, 1999	MACC sends final report of customers to long distance carriers.
-0	September 19, 1999	Equal access conversion date.
+180	March 17, 2000	End of free PIC change period for allocated customers.

ADDITIONAL DATES
For the Benefit of the Interexchange Provider

<u>DAYS PRIOR TO CONVERSION</u>	<u>DATE</u>	<u>ACTIVITY</u>
-175	March 18, 1999	Universal list available to requesting IP's.
-120	May 21, 1999	The following items are due from IP's requesting listing on ballot: Letter of Intent, Access Service Request, Letter of Agency Agreement, Ballot Specifications Form, Allocation Participation Form, Customer Information Agreement, Customer List Order Form.
-90	June 22, 1999	Equal Access translation questionnaire due. Balloted list mailed to requesting IP's.
-60	July 21, 1999	2402, 2406 lists mailed to requesting IP's.
-40	August 10, 1999	2403, 2404, 2405 lists mailed to requesting IP's.

Kennebec TELEPHONE COMPANY
PRECONVERSION PROCEDURES AND PROCESSES

Introduction

Kennebec Telephone Company will implement InterLATA Equal Access capability utilizing the ballot and allocation process specified by FCC Filing 83-1145, and IntraLATA Equal Access according to the Dialing Parity Policy established in C-1128, Progression Order 4. Equal Access is an end office feature allowing customers served by that office to select and specify a Primary Interexchange Carrier (PIC) to carry all InterLATA 1 + dialed calls originated by an end user and an IntraLATA carrier to carry all IntraLATA 1+ dialed calls originated by an end user. The customer is invited to make primary IP selections prior to end office conversion to Equal Access.

Ballot Process

We will notify end user customers of the availability of Equal Access through the mailing of ballots. The ballots are our preferred method of notification of the end users' selection of their long distance carriers. The end user will be given two opportunities to designate their long distance carriers prior to Equal Access.

General Public Education

We will implement a customer education program designed to provide comprehensive information to the public on the balloting, allocation, and default processes.

The objectives of the education program are three-fold:

1. Maintain a neutral position concerning the selection of a specific interexchange providers.
2. Educate all customers on equal access and the ballots.
3. Educate all customers on the importance of completing the ballots properly and returning them prior to the conversion date.

Billing Telephone Number Ballot

End users will be balloted by Main Billed Telephone Number.

First Ballots

The first ballots will be mailed to end users approximately ninety (90) days before the office conversion date. End users will be asked to return the ballots within thirty (30) days of the initial mailing date. The specific cutoff date for the return of the first ballots will be printed on the ballots. The return date establishes the time frame through which the first ballots inputs will be processed to be used for non-pre-subscribed end user allocation percentages and end users requiring second ballots.

First ballots will be processed up to the return date specified on the first ballots. First ballots arriving after this cutoff date will be input as the end user's PICs. However, the end users returning late ballots will also receive second ballots. If they return the second ballots the second ballots will be counted as their official PICs.

The first and second ballots will randomly list the names of all IP's participating in the presubscription process. A single line end user may select only one interLATA and only one intraLATA PIC. The interLATA PIC and the IntraLATA PIC may or may not be the same. A multiple line end user may select multiple PICs for individual lines.

Second Ballot and Allocation Notice

Second ballots and an allocation notice will be sent by MACC to end users who do not make a choice by the date specified on the first ballots. The second ballots will be mailed forty (40) days prior to equal access conversion. These ballots will also serve as a preliminary notice of allocation and default. The end user who does not select an interLATA PIC prior to conversion will be connected to a randomly assigned IP for any 1 + dialed calls terminating outside the LATA. This random assignment will be made via a formula explained in the following section called "Allocation." The end user who does not select an intraLATA carrier prior to conversion will be assigned to his/her interLATA long distance carrier.

InterLATA second ballots will look similar to the first ballots except it will contain a section informing the end user if they do not return the ballot by the specified date, they will be assigned to the InterLATA IP listed on the InterLATA ballot. The ballot will clearly state the assignment is random. IntraLATA second ballots will advise the end user that if no IntraLATA carrier is selected, they will be assigned to their interLATA long distance carrier.

No-PIC Option

End users electing to make a "no PIC" selection may do so by contacting the business office.

Allocation

The allocation process described below is used in determining InterLATA PICs only.

End user customers who do not select an InterLATA PIC by the pre-subscribed deadline will be notified on a second ballot. If they do not return the second ballot, contact the business office, or notify the company by letter of authorization (LOA) from their InterLATA PIC, they will be allocated to an InterLATA IP on the conversion date.

Allocation is an automated process conducted separately for residence or business customers who have not responded or selected an InterLATA PIC on their first ballot. Participation in the allocation process is optional to the IPs.

The basis for the allocation calculation is the total customer responses via the first ballot and LOA orders. The calculation will be based on LOA orders and ballots received by the first ballot deadline. The allocation calculation will be based on the total number of access line PIC selections. For example: If an IP receives 20% of the total number of access line PICs generated during the first ballot period, this IP would be allocated 20% of the remaining unallocated access lines that did not return a PIC selection.

If a situation occurs where all IPs do not wish to participate in allocation, the lines that would have been allocated to the non-participating IPs will be divided among the remaining IPs in a manner proportionate to the percentage of responses obtained by the IPs participating in allocation.

For example, if on the initial ballot return:

- Carrier A receives 30% of the lines
- Carrier B receives 30% of the lines
- Carrier C receives 15% of the lines
- Carrier D receives 15% of the lines
- Carrier E receives 10% of the lines

and Carriers D and E decline to participate in allocation, then:

25% of the non-respondents' lines would be allocated to Carriers A, B, and C; therefore:

- Carrier A will receive 40% of the total allocated lines
- Carrier B will receive 40% of the total allocated lines
- Carrier C will receive 20% of the total allocated lines

Participation in Allocation by an IP

IPs choosing to be on the first ballot may participate in the allocation process. They must notify us seventy (70) days prior to the date of conversion. They must state whether they opt for either business or residence customers or both. IPs who wish to receive allocated customers must meet the following criteria for a two year period as specified by FCC Ruling 83-1145 Phase I:

- The IP must appear on the first ballot.
- The IP must have the capacity of offering service to any point within the continental United States.
- The IP must not impose any fixed monthly or non-recurring charges to assigned customers without their consent.
- The IP must provide service to the allocated end users equal to that provided to the IP's pre-subscribed customers.
- The IP must not charge its assigned customers a rate for its service exceeding the highest price in effect for MTS-type service without their consent.
- If an IP wishes to change any of the above criteria within a two year period from the end office activation date, it must notify its allocated customers of those changes 30 days before these changes are to take place. If a customer decides to change carriers because of the change in policy, the carrier must pay the charges associated with making that change.

Balloted Customers

We will send ballots to all customers who have a line that can originate ANI traffic and can be pre-subscribed to a specific IP. Public and semi-public coin lines, DID and WATS will not be eligible to receive ballots. The telephone company will choose a PIC for official telephone company lines and those lines will be included in the allocation calculations.

Rules for Customer PIC Selections

In the event we contact a customer concerning a PIC selection, the contact person will under no circumstances make recommendations or offer suggestions relative to the customer's selection of a long distance company.

Customers may make PIC selections by ballot, by contacting the business office, or by direct

contact with an IP (authorized LOA).

The following rules and order of accepting PICs will be used:

A. Between First Ballot Mailing and Allocation:

1. Input from business office (Super Ballot).
2. Ballot PIC choice is always accepted unless changed by a Super Ballot.
3. Letter of agency (IP input) is accepted if no ballot or Super Ballot exists.
4. Second and following letters of agency, from another IP, for a line already PIC'd by an LOA places the line into an allocation-eligible status.

B. After Allocation and Second Ballot Mailing:

1. Input from the business office (Super Ballot).
2. Second ballot PIC choice (Note: This can change a late first ballot, but not a Super Ballot.)
3. Letter of agency with the most recent authorization date if the line has not been previously PIC'd by first ballot, second ballot, or Super Ballot.

C. After conversion:

1. Most recent authorization date (business office, contact, ballot, LOA).

PIC selections made in the business office will be referred to as a "Super Ballot". Super Ballots are utilized usually in one of the following situations only for lines on the initial ballot list:

1. Customer knows they have received a ballot but misplaced it.
2. Customer has signed up with more than one IP and wants to correct his/her choice.
3. Customer is not sure who he/she PIC'd and needs help.
4. No PIC selection.

New Customer PIC Selection Procedures

New customers who move into the area during the conversion process will be handled under the following procedures:

New customers will be asked to select a PIC for their 1 + dialed interLATA and intraLATA long distance traffic. These PICs may or may not be the same. It will be included in the business office procedures to inform the new customers of all IPs participating in equal access. The Customer Service Representative (CSR) will randomly reference the names of the carriers providing long distance. If the customer requests, the CSR will provide the contact

telephone numbers of the carriers. Lists used by the CSRs will contain carriers' names in random order, similar to the rotation used on the ballot.

Customers applying for service will be encouraged to make carrier selections. Customers will be advised if they do not make selections, 1+dialed interLATA and intraLATA calls originating from the customer's access line will not be possible until a carrier selection is made. Until a selection is made, customers will need to dial 10XXXX (XXXX is the carrier ID code) in order to make an interLATA or an intraLATA long distance call. The CSRs will not attempt to explain the casual billing operation, but will refer the end user customers to the IPs for this information. When the customer does make carrier selections, the business office will record the selections and advise the central office to assign the customer's line to the selected carriers. We will activate the customer's carrier selections within the normal service installation interval.

The customer will be encouraged to make carrier selections. Customers will not be charged for the initial PIC selections as long as we receive the PIC selections prior to the conversion. After the conversion, customers will be blocked from 1 + dialing until they make PIC selections.

Any changes submitted to us after the activation load deadline (approximately 20 days before conversion), but before the conversion, will not have those PICs activated until after the conversion. We will not charge the customer or the IP for PIC changes received prior to conversion.

Accounts Requiring Special Handling

Some account types requiring special handling to insure uninterrupted service may include the following:

1. Government accounts
2. School district accounts
3. Major accounts with specialized billing requirements
4. Handicapped customers

These accounts may be contacted by a telephone company representative. This contact will be used to explain the carrier selection process. The representative will not reference any particular carriers. The representative will, however, explain that if the customers do not select PICs for each access line or line groups, the customer's lines will be allocated for interLATA long distance and will be assigned to their interLATA long distance carrier for intraLATA long distance.

CUSTOMER EDUCATION

In order for your Equal Access Conversion to go as smoothly as possible, we recommend that you educate your customers early on in the process. This makes them aware of the changes coming up, and also prepares them to be looking for the ballot when it is mailed. The following are some ideas for customer education that we have found helpful. Please feel free to use one or all of these educational tools.

NEWSPAPER ADS (see samples in the carrier manual)

RADIO SPOTS (utilizing local radio stations)

BILL STUFFERS (see the following initial customer notification)

INFORMATIONAL BROCHURE OR LETTER MAILING

POSTERS/FLYERS IN THE BUSINESS OFFICE

NEWSLETTER ARTICLE

LOCAL MEETINGS-

CIVIC ORGANIZATIONS

PTA

RETIREMENT HOMES

COMMUNITY CENTER/TOWN HALL

SENIOR CITIZENS CENTER

The objectives of the education program should be three-fold:

1. **Maintain a neutral position concerning the selection of a specific Interexchange Carrier.**
2. **Educate all customers on equal access and the ballot.**
3. **Educate all customers on the importance of completing the ballot properly and returning it prior to the conversion date.**

It is MACC's job to do the paperwork side of the equal access process to leave the telephone company more time to educate their customers and deal with customer questions. The more your customers know, the easier everyone's jobs will be.

INITIAL CUSTOMER NOTIFICATION

EQUAL ACCESS WHAT IT IS AND WHAT IT MEANS TO YOU

Dear Customer:

This year Kennebec Telephone Company will be going through some changes that will affect each and every customer. On September 19, 1999, the telephone company will be converting to Equal Access.

Equal Access means you will be able to choose your long distance carrier(s). At the present time, Express Communications provides you with 0+ and 1+ long distance service within the 605 calling area. This area is referred to as a Local Access and Transport Area (LATA). (See attached map.) AT&T is your long distance carrier for calls outside of this area. Equal access will allow you to select your long distance carrier for interLATA calls and a carrier for intraLATA calls according to your wants and needs. On June 22, two ballots will be mailed to you: one for interLATA long distance and one for intraLATA long distance. These ballots will list those carriers which elected to be included in the balloting process. At this time, we do not know which carriers will be offering services to you. During the next few months, you will be contacted by different carriers who will be offering their plans and services to you. Feel free to question them regarding their service.

If you have any questions regarding equal access, please contact the telephone office and we will assist you in any way we can. Our number is (605) 869-2220. As further information becomes available, we will try to keep you informed.

Kennebec Telephone Company

LOCAL ACCESS AND TRANSPORT AREA (LATA) MAP

INTERLATA SUPER BALLOT - SAMPLE

INTRALATA SUPER BALLOT - SAMPLE

SAMPLE ADS

Sample Ad 1: Telephone Company Announces Equal Access

Kennebec Telephone Company has been notified by several long distance carriers of their interest in being on the selection ballot to offer "1+" long distance service, more commonly referred to as equal access, to Kennebec Telephone Company customers effective in September, 1999.

"Since the long distance business is very competitive, Kennebec Telephone Company customers should be aware that some of the long distance carriers may contact them by phone or mail, providing information about their services. This is an excellent time to educate yourself by asking questions. They are the best ones to answer them," said Rod Bowar, Kennebec Telephone Co., Inc.'s manager.

The official ballots will be mailed to Kennebec Telephone Company customers on June 22, 1999. The ballots will list all long distance carriers wishing to participate in the equal access conversion. In the meantime, Kennebec Telephone Company will keep its customers informed of the equal access process with bill inserts, media advertising, and news releases.

Sample Ad 2: Equal Access Ballots to Arrive Soon

Approximately a month ago, Kennebec Telephone Company shared with this paper's readers the company's plans to provide its customers a choice in long distance providers. Today, this paper learned the selection ballots for what is called equal access will be arriving in the mail in the next day or two. According to Rod Bowar, Kennebec Telephone Company manager, "It is very important that our customers mark the ballots with the long-distance carriers of their choice and return them in the envelope provided." Bowar went on to say the return envelope will have a Blair, Nebraska, return address because Mid America Computer Corporation of Blair is responsible for tabulating the ballots and providing carrier selection notification.

Sample Ad 3: Last Chance for Telco Customers to Vote

A process that started in March is coming closer to fruition for Kennebec Telephone Company and its customers. That process is the equal access conversion of the company. What this means is the company's customers are being provided a choice in whom they want to have carry their long distance calls. On or about September 19, 1999, telephone company personnel will be programming the electronic switch with instructions on what long distance carrier will carry each customer's calls. However, before this can be done, a few of Kennebec Telephone Company's customers have failed to return the first carrier selection ballot and are now being sent second ballots. If they do not return these ballots, FCC regulations require that a random selection of an InterLATA carrier be made for them. No selection of an IntraLATA carrier (for long distance calls in the 605 calling area) will result in those calls being handled by their interLATA long distance carrier. Rod Bowar, manager of Kennebec Telephone Company said, "We would prefer our customers make their own choice. They may not get the carriers they'd prefer if we do it."

SAMPLE FIRST LETTER

Dear Customer:

Changes in the telephone industry have made it possible for more than one long distance company to ask for your long distance service. You are now being asked to make some choices regarding your long distance service.

Currently, Express Communications provides you with 1+ long distance service within the 605 calling area. This area is referred to as a Local Access and Transport Area (LATA). (See enclosed map.) AT&T is presently providing you 1+ long distance outside of the LATA.

Enclosed are two ballots: one to use to choose your interLATA long distance company, and one to use for selecting an intraLATA long distance carrier. (This may or may not be the same carrier.)

You can get 1 + long distance service from any of the companies listed on these ballots. To make sure you select the company that is right for your calling needs, we suggest you call these companies at the numbers listed and ask about their rates and services. **Then mark your choices, sign, date and return the ballots in the enclosed envelope.**

Your telephone line will be connected to the long distance company (s) you have selected on the date shown on the ballots. You will not be charged for the initial connection. However, if you decide to change companies after your initial selections have been activated, you will be charged for this change.

We cannot recommend which long distance company is right for you. We do, however, encourage you to make a choice. If you do not choose an interLATA long distance company by the deadline shown on the ballot, Federal Communications Commission rules require you be randomly assigned to one of the long distance companies listed on the ballot. We prefer you make your own choice. For intraLATA long distance, if you do not make a choice, you will be assigned to your interLATA long distance carrier.

Take time now to find out which long distance company is right for you, **mark your choices, sign, date and return the ballots in the enclosed envelope.** If you have already signed up with one of the companies by returning their authorization card, we would still like to have you complete and return the enclosed ballot, just to make sure your choice is recorded accurately and without delay.

If you have any questions about the equal access selection process, call our business office at (605) 869-2220.

INTERLATA FIRST BALLOT - SAMPLE

INTRALATA FIRST BALLOT - SAMPLE

SAMPLE ALLOCATION AND DEFAULT NOTICE

Dear Customer:

If you mailed your Equal Access Ballots after the ballot deadline, disregard this notification. We will process your choices from those ballots. For those of you who didn't return those ballots, please read on...

Recently we sent you equal access ballots so you could choose a long distance company for interLATA 1+ calling and a long distance company for intraLATA 1+ calling. We were unable to process your choice because we did not receive your response, or we have conflicting information on your choice from two or more long distance companies. The Federal Communications Commission requires us to send customers with conflicting choices an allocation ballot in order to ensure customers will receive the interLATA long distance company of their choice.

Since we could not process your choice, federal guidelines require us to randomly assign you and other customers who have not made a choice to a long distance company serving our area. The name of the long distance company and the date they will begin providing your long distance service are shown on the enclosed ballot. If you do not respond to this notice by the deadline, the assigned long distance company will provide your long distance service.

However, it is not too late to make your own choice. If you are not satisfied with the company to which you were randomly assigned, simply mark your choice of company, sign, date and return the enclosed ballot immediately. There is no charge to make a change at this time.

Information about these 1 + long distance companies can be obtained by contacting them directly at the telephone numbers listed. We have no preference for which company (s) you choose, we just want to make sure you are aware of your choices.

Thank you for your cooperation. If you have any questions about equal access, please contact our business office at (605) 469-2220.

INTERLATA ALLOCATION BALLOT - SAMPLE

INTRALATA ALLOCATION BALLOT - SAMPLE

SUBMITTING LETTER OF AGENCY ORDERS

Whenever an end user customer establishes an account with a carrier to presubscribe to the carrier, the carrier must submit to Mid America Computer Corp. (MACC) or to Kennebec Telephone Company a Letter of Agency (LOA) order.

The LOA order is the accepted IP medium for communicating to MACC and to Kennebec Telephone Company an end user customer's PIC selection. MACC will accept LOA orders in either tape or paper format prior to conversion. The tapes must be in CARE format. After conversion, LOA orders will be accepted by Kennebec Telephone Company on paper only. All LOA orders must be accompanied by a transmittal letter.

IPs may begin submitting LOA orders to MACC 90 days before the conversion and ending at approximately the 20-day second ballot deadline. To apply to allocation accounts, all LOA orders must be received at MACC by the first ballot deadline.

LOA orders received by Kennebec Telephone Company after the second ballot deadline, but prior to the conversion, will not be activated until the conversion has been completed, but will be worked for no change charge. After the conversion all PIC change orders received will be worked for no change charge on allocated customers during the 6 month grace period and for IntraLATA PICs for all customers during the 90 day grace period. The customer will be informed that any PIC selection after the grace period will involve a \$5.00 charge to the customer.

Carriers must support customer commitments by an individual Letter of Agency signed and dated by the customer. The LOA must, at a minimum, meet the following conditions:

- . The customer designates the IP to act as his/her agent.
- . The customer understands that only one IP may be designated as his/her primary interLATA IP and only one IP may be designated as his/her primary intraLATA IP (the IP for interLATA calls and the IP for intraLATA calls may or may not be the same IP) for any one telephone number.
- . The customer understands that any PIC selection after the initial one will involve a charge to the customer, unless such change occurs prior to the conversion or during the post conversion grace period.

LOA EXCEPTION REPORTS

MACC or Kennebec Telephone Company will provide the IPs reports showing the status of rejected LOAs using the TCSIs used for rejected subscription orders. These reports will be sent to the IP within a maximum of seven (7) working days after submitting an LOA. This report identifies the carrier and the reason each line was rejected. This report is provided in paper format only.

LETTER OF AGENCY AGREEMENT

Date: _____

(IP) _____ certifies that the following requirements will be followed when submitting a letter of agency to Kennebec Telephone Company:

1. The customer has designated the carrier to act as the customer's agent for the pre-conversion process.
2. The customer is informed that only one carrier may be designated as the customer's PIC for any one telephone number, and that the selection of multiple carriers for this purpose will invalidate all such selections.
3. The customer is informed that any PIC selection made after conversion will involve a charge to the customer.
4. The specified telephone number(s) whose PIC is being designated must be listed.
5. Kennebec Telephone Company reserves the right to contact the customer for verification of PIC selection made by a letter of agency.

All written documentation must be available for inspection by Kennebec Telephone Company. The IP also agrees to accept responsibility for any billing disputes of an end user customer arising from implementation of its customer list.

Signed _____

(Please Print Name) _____

Name of Company _____

LOA ORDER
ADDRESS INFORMATION

As indicated, Kennebec Telephone Company has obtained the services of Mid America Computer Corporation to perform the balloting portion of the pre-conversion phase of equal access. The IPs will interact directly with Mid America Computer Corporation during this process.

Pre-conversion (until 20 days prior to conversion) LOA orders are to be submitted to:

Mid America Computer Corporation
111 Admiral Dr., P.O. Box 400
Blair, NE 68008
ATTN: Equal Access

(Tape or Paper format accepted)

Post-conversion (from 20 days prior to conversion) LOA orders are to be submitted to:

Kennebec Telephone Company
100 S. Main Street
Kennebec, SD 57544
ATTN: Equal Access

(Paper format accepted only)

***PLEASE NOTE: A completed transmittal form must accompany each tape or paper submission**

DISPLACED PIC REPORT

A report will be provided to the IP to show previously accepted PICs that have been overridden by a priority PIC (e.g., a Super Ballot, ballot...).

This report identifies the carrier and the reason each line was rejected using transaction codes and status indicators as identified in the Bellcore CARE Manual.

This report is provided in paper format only and is provided to the IP a minimum of once a week.

PIC CHANGE CHARGE APPLICATION

All end user customers who were allocated an interLATA PIC will be given one free interLATA PIC selection for each access line until six months after the conversion date. Prior to the conversion date end user customers can make PIC changes at no charge.

After conversion, customers that have made their free interLATA PIC selection via a ballot, through a Letter of Agency, or through the business office will be charged the PIC change charge each time their interLATA carrier selection is changed. End user customers that transfer or change service will be charged a change charge if the customer changes the interLATA PIC selection. IntraLATA PICs may be changed without charge through the grace period that ends 90 days after conversion.

Usually, PIC change charges will be billed to the end user customer. There are, however, three exceptions to this practice:

1. When an IP with allocated customers changes its policy under the allocated customer assignment rules, the IP will be billed all customer change charges that are applicable.
2. When an IP no longer offers 1+ interLATA dialing, the IP will be billed for all associated PIC change charges.
3. When an IP that has submitted an LOA on behalf of an end user customer cannot provide evidence of proper authorization, any charge associated with changing the customer PIC will be credited to the end user's account and billed to the IP.

**Kennebec Telephone Company
100 S. Main Street
Kennebec, SD 57544**

Phone: (605) 869-2220

Fax: (605) 869-2221

March 22, 1999

TO WHOM IT MAY CONCERN:

Kennebec Telephone Company is pleased to announce we are offering Equal Access to all authorized carriers. Conversion to Equal Access is planned by September 19, 1999 and we ask you to inform us by May 21, 1999 if your company is interested in being an equal access provider.

Kennebec Telephone Company is located in Kennebec, SD. We will be offering Equal Access for **interLATA** and **intraLATA** calls for the Kennebec area. We will be offering **intraLATA** Equal Access for the Presho area.

Kennebec Telephone Company has engaged Mid America Computer Corporation (MACC) to assist in the balloting, allocating non-pre-subscribed access lines, and the dissemination of information including subscriber lists and required reports. MACC is headquartered in Blair, Nebraska.

Enclosed are the following forms which must be returned if you choose to participate in the equal access conversion: the letter of intent and ballot information form, allocation agreement, letter of agency agreement, customer information agreement, and customer list address/order form. Also included is a copy of the time line and Kennebec Telephone Company's end office information.

Kennebec Telephone Company is please to offer Equal Access Service to our customers. We hope to receive your response by May 21, 1999, and look forward to a mutually beneficial business relationship.

Sincerely,

Rod Bowar
Manager
Kennebec Telephone Company

INTEREXCHANGE CARRIER REQUIREMENTS

Procedures for participation in the Equal Access conversion process consist of submitting the following documents:

DUE DATE May 21, 1999 (120 days prior to conversion)

- A. **Equal Access Letter of Intent to Order Equal Access**
- B. **Ballot Listing Specifications**
- C. **Access Service Request/ TQ**
- D. **Allocation Acceptance Form**
- E. **Letter of Agency Agreement**
- F. **Customer Information Agreement**
- G. **Customer List/ Address Order Form**

We recommend delivery of these forms via a method that provides a delivery confirmation. Failure to provide these forms within the specified time frame may delay provision of service and will preclude the long distance company from participating in the pre-subscription process.

Return to: **Equal Access Coordinator
Mid America Computer Corporation
111 Admiral Drive, P.O. Box 400
Blair, NE 68008-0400**

LETTER OF INTENT TO ORDER EQUAL ACCESS (FG-D)

The letter of intent to order Equal Access consists of two parts, "Notification of Intent to Order Equal Access" in specific converting offices, and "Ballot Listing Specifications". It should be received by the EAC 120 days prior to the conversion date listed on the time line.

Name of Carrier _____

Address _____

City, State, Zip _____

Contact Name _____

Contact Telephone Number _____

Contact Fax Number _____

Carrier Identification Code (CIC) _____

Access Customer Name Abbreviation (ACNA) _____

The above named IP hereby notifies the EP that it will order Feature Group D (FGD) access service in the converting office(s) as they are listed on the converting office profile. The above named IP certifies that it has met all state and federal requirements for legal operations and agrees to perform in compliance with all time frames and agreements as specified in the Equal Access Carrier Manual.

Please mark the box with an "X" next to the equal access you want to participate in.

(EP) Kennebec Telephone Company
is offering equal access for the following:

☒ InterL ATA Equal Access ☐

☒ IntraLATA Equal Access ☐

BALLOT LISTING SPECIFICATIONS

Ballot listing will be three (3) lines, not to exceed 30 characters on any line. The first line should include the name of the interexchange provider (IP) (alpha or numeric characters accepted), and the second and third lines should contain telephone numbers that end users can call to obtain information regarding the IP's services to a business or residence (numeric characters only). There will be no advertising allowed on the ballot.

(30 characters) Name of Company
(30 characters) Identification Listing Telephone Number
(30 characters) Identification Listing Telephone Number

Sample Listing: AAA Company
 Business 1-800-222-2222
 Residence 1-800-333-3333

Please list below how you want your company's information to appear on the Equal Access Ballot. Each IP has three lines of 30 characters each (including spaces). No carrier logos or artwork will be used on the ballot.

Name of Company _____
(Must be in capital letters)

Customer Contact Number(s) (numeric characters only):

Residence _____

Business _____

ACCESS SERVICE REQUEST (ASR)

Each interexchange provider must submit its order for access service to the EAC for each office at which equal access service is desired. The order for access, in the form of an Access Service Request (ASR), provides Kennebec Telephone Company with the necessary information required for the installation of circuits and for the establishment of billing the appropriate customer account.

Requests for access service, ordered under the appropriate Switched Access Tariffs, must be submitted at least 120 days prior to the scheduled equal access conversion date.

We are requiring a test date for FGD circuits two to four weeks prior to Equal Access conversion. This provides ample time to test equal access tables in the switch, perform transmission tests, verify IP recordings, and create AMA tapes for originating and terminating calls per the call script. These AMA records are then processed through the CABS test system. Include a test date in the remarks section of the ASR for FGD service.

FGD Access will be provided at each end office. IP interconnection will be provided at the tandem for all subtending end offices.

ALLOCATION ACCEPTANCE FORM

The Allocation Acceptance Form indicates the interexchange provider's allocation preference. Long distance companies who have appeared on the first ballot and satisfy the requirements for accepting allocated customers have the option of choosing to select both business and residential allocated customers, business or residential allocated customers, or not to accept allocated customers at all. The Allocation Acceptance Form must be returned to the EAC 120 days prior to conversion.

As a representative for (IP) _____, I certify that after having placed a Feature Group D order in the office of Kennebec Telephone Company our allocation intentions are as follows:

_____ Allocation of both residential and business customers.

_____ Allocation of residential customers.

_____ Allocation of business customers.

_____ Wish not to participate in allocation process.

If above noted IP does wish to participate in allocated traffic, I certify as a representative of said company that the following conditions will be met for a minimum of two years.

- 1) The Interexchange Provider has terminating ubiquity.
- 2) The Interexchange Provider will not assess recurring or minimum monthly charges to assigned subscribers.
- 3) The cost of service will not exceed the highest price in effect under FCC tariff for MTS-type service.
- 4) The quality of service provided to assigned subscribers will be at least equal to that provided other customers.
- 5) The Interexchange Provider will accept all customers assigned to it.

If, within two years, the IP changes any of these criteria, the customer will be notified. If, because of those changes, the customer wishes to change Interexchange Providers, this IP will pay the non-recurring charge.

Signed _____

Name _____
(Please Print)

Date _____

EQUAL ACCESS TRANSLATIONS QUESTIONNAIRE

The Equal Access Translations Questionnaire (TQ) is a summary of network administrative data to be submitted by each interexchange provider (IP) in conjunction with an Access Service Request (ASR) to order Feature Group D (FGD) service in an equal access end office or tandem.

The TQ details call routing and blocking of certain customer's calls routed to the IP's network.

Although the ASR is the method by which IP's will order exchange access, including Equal Access, the informational requirements to initially translate FGD exceed what is available on the ASR. Therefore, the completion of the TQ will be required when an IP places an initial order for FGD access. An ASR simply adding capacity to an existing FGD access arrangement will not necessitate the completion of the TQ. Also, it is possible that an IP might wish to rearrange existing service without ordering additional capacity. In this case, the TQ may be required while an ASR may not. Some of the information included on the TQ might appear redundant when compared with information on the ASR; however, it is included to ensure complete understanding of the IP's desired serving arrangement.

Description of Entries - General

1. IP Name - Enter the name of the IP submitting the TQ.
- 2.. Technical Contact - Enter the name of the person submitting the TQ. (It is recommended that the name entered be the technically oriented person who prepared the questionnaire rather than the administrative person through whom the questionnaire might be transmitted, as most questions which may arise will be of a technical nature.)
3. Telephone Number - Enter the telephone number of the technical contact to whom questions concerning the form's content may be directed.
4. Mailing Address - Enter the mailing address to which written inquiries should be sent.
5. Carrier Access Code - Enter the Equal Access code (10XXXX) of the submitting IP.
6. Equal Access End Office CLLI Code - Enter the identity of the end office or access tandem to which this questionnaire applies. The identity should be in eleven character Common Language Location Identifier (CLLI) format.
7. Access Arrangement (New or Existing) - Specify whether this questionnaire represents the establishment of a new service arrangement or a change to an existing arrangement.
8. Associated ASR Number(s) - Enter the number or numbers of the associated ASR(s) or some other unique identity by which the associated ASR(s) may be identified
9. POT Identity(s) - Enter the identity of the point(s) of termination to be involved in this access arrangement. The identity should be in eleven character CLLI format.
10. Effective Date - Enter the date changes are effective or service is to be established.

Description of Entries-Non-Route Specific Information

1. Carrier Classification
 - A. **Domestic** - These are IP's that provide connections between LATA's and service areas where the calling and called customers are in World Zone I.

EQUAL ACCESS TO (CONT'D)

Primary routing is performed without regard to the end user's class of service. The segregation of traffic by route is primarily selected by the type of traffic involved as differentiated by the service prefix dialed.

There are several primary routes which may be selected. Their identity and dialing pattern are as indicated below:

Identity

Domestic

- A. (1)+7/10 digit
- B. (10XXXXX)+(1)+7/10 digit
- C. (10XXXXX)+0+7/10 digit
- D. 10XXXXX + 0
- E. 10XXXXX + #
- F. 00

Dialing Pattern

- Pre-subscribed/Non-operator
- Non-operator
- IP Operator Assisted
- IP Operator Assisted
- Cut-through to IP Operator
- IP Operator Serviced

International

- G. (10XXXXX)+011+cc+nn
- H. (10XXXXX)+01+cc+nn
- I. 011+cc+nn
- J. 01+cc+nn

Dialing Pattern

- Non INC Operator
- INC Operator Serviced
- Pre-subscribed Non INC Operator
- Pre-subscribed INC Operator

*PLEASE NOTE: Parentheses indicate optional dialing.

2. Class of Service Restriction and Blocking

It will be a practice to block unwanted parcels of equal access traffic as close to the source as possible rather than higher in the exchange access or IP networks. Accordingly, subject to the desires of each individual IP and the ability of the telephone company to comply, we will block unwanted parcels of traffic to an appropriate recorded announcement.

IP's may desire that we perform no blocking whatsoever. In this instance, we will deliver to the IP all parcels of equal access traffic in a routing pattern as specified by the IP. However, an IP may request to deliver its own recorded or voice message to end users representing undesired parcels of traffic. In this instance, in terms of the ability of Kennebec Telephone Company to assist in the process, two possibilities exist. First, the identity of certain parcels of traffic may be determined by the IP from the "II" portion of the ANI out-pulsing sequence. The classes of service and "II" digit values are as follows:

EQUAL ACCESS TQ (CONT'D)

<u>Class of Service</u>	<u>II Digits</u>
ANI Failure	02
Hotel Without Room Identification	06
Coinless, Hospital, Inmate, etc.	07
InterLATA Restricted	08
Test Call	10
AIOD* Listed Number Sent	20
Coin	27
InterLATA Restricted-Hotel	68
InterLATA Restricted, Coinless, etc.	78
Test Call	95
All Others	00

*Automatically Identified Outward Dial

Second, subject to the telephone company's ability to do so, the unwanted parcels of traffic may be delivered to the IP over a special segregated trunk group. This would allow the IP to take special action on all traffic arriving on the special trunk group.

Traffic charges will be applied for the blocking of unwanted parcels traffic as specified by the IP and based on the approval of the appropriate regulatory body and under an approved tariff.

3. Multiple Trunk Groups

If more than one trunk group has been specified, the IP should submit information pertaining to each group's identity characteristics, class of service restrictions and call types carried over the group. Descriptions of these elements are the same as those previously described for the TQ.

EQUAL ACCESS TRANSLATIONS QUESTIONNAIRE

Section I - General

1. Interexchange Provider (IP) Name: _____
2. Technical Contact Name: _____
3. Contact Telephone Number: _____
4. Mailing Address: _____
5. Carrier Access Code (10XXXX): _____
6. Equal Access End Office CLLI Code: _____
7. Access Arrangement (new or existing): _____
8. Associated ASR Number(s): _____
9. POT Identity: _____
10. Effective Date: _____

Section II - Non-Route Specific Information

1. Carrier Classification - Check type of calls to be processed:

A. Domestic	Orig	Term	2-Way
B. International	Orig	Term	2-Way
C. Consolidated	Orig	Term	2-Way
2. Carrier Status - Check type of applicable status:

A. Long Term Status (Pre-subscription or 10XXXX only)	
B. Transitional (10XXXX or 950-YXXXX)	
C. Interim (950-YXXXX only)	
3. Carrier Characteristics - Circle applicable characteristics:

A. ANI (Automatic Number Identity)	Yes	No	
B. Non-overlap Out-pulsing	Yes	No	
C. Cut-Through Allowed (10XXXX#)	Yes	No	
4. Multiple Trunk Groups - If more than one trunk group has been ordered, complete the following.

A. Trunk Group Identification	Yes	No	
ANI	Yes	No	
Non-Overlap Out-pulsing	Yes	No	
B. Description of classes of service and call types to be carried on this trunk group.	_____		
C. Trunk Group Identification	Yes	No	
ANI	Yes	No	
Non-Overlap Out-pulsing	Yes	No	
D. Description of classes of service and call types to be carried on this trunk group.	_____		
E. Trunk Group Identification	Yes	No	
ANI	Yes	No	
Non-Overlap Out-pulsing	Yes	No	
F. Description of classes of service and call types to be carried on this trunk group.	_____		
G. Trunk Group Identification	Yes	No	
ANI	Yes	No	
Non-Overlap Out-pulsing	Yes	No	
H. Description of classes of service and call types to be carried on this trunk group.	_____		
I. Other Appropriate Information:			
- Trunk Selection Sequence on Interexchange Provider end			
Low to High	Most Idle		
High to Low	Least Idle		
- Type signaling both ways (e.g., MF wink, etc.)			
- Type of Interexchange Provider Switch			

TRUNK ALLOCATION PLAN
AND
FIVE (5) YEAR FORECASTS

In the event a shortage of FG-D facilities exists, we will make every reasonable effort to obtain the items necessary to meet all access service requests as of the equal access service date. In the event these efforts are unsuccessful, the available equal access Feature Group D facilities will be allocated on a proportioned basis.

The allocated resource amounts will remain effective until additional facilities can be made available or actual usage experience for all equal access service indicates a more appropriate distribution of available resources. Any additional facilities will be made available on a proportioned basis to all participating users of access. Adjustments made due to actual usage will occur within 90 days after service availability in the end office. If necessary, this reallocation process will continue at three-month intervals until all initial service requests have been met.

If allocation status is necessary for initial service requests, we will notify participating IPs and an explanation of the allocation process will be supplied.

We strongly recommend that IPs supply a five year forecast of trunk and circuit usage for offices associated under the pending equal access conversion. Such a forecast will allow us to project trunk demands in advance and adequately meet the needs of the IP as FG-D service areas expand and carriers take on more customers.

PRE-CONVERSION REPORTS AND CUSTOMER LISTS

Mid America Computer Corp. will offer a series of pre-conversion customer lists. These customer lists are available to assist interexchange providers (IPs) in their pre-conversion solicitation efforts and tracking previously obtained customers. These lists will be provided for a fee of \$150.00 each, with delivery contingent upon the IP's meeting all Kennebec Telephone Company requirements for participation.

MACC will provide the three FCC required reports to the IP's at no charge:

- A. **The first required report** will be mailed to each participating IP halfway between the mailing of the first ballot and the first ballot return deadline, which will be approximately 70 days before the conversion date. This report will provide a listing of all PICs received by the EP via ballots and letters of agency (LOAs).
 - B. **The second report** will be mailed to each participating IP when the second ballot is mailed, which is approximately 40 days before the conversion date. This report will provide a listing which reflects all PICs received by the EP via ballots and LOAs, and also those customers tentatively allocated to the carrier for whom the report is prepared.
 - C. **The third report** will consist of a listing which reflects all PICs received by the EP via ballots, LOAs, and all customers allocated to the carrier for whom the report is prepared. This report will be mailed to each participating IP approximately 10 days before conversion.
- All pre-conversion lists and reports may be ordered on either magnetic tape, diskette, or paper printout except where otherwise indicated. The Customer Account Record Exchange (CARE) format will be utilized for all reports and are designed to present a preliminary view of the end user customers who have chosen or were allocated to the carrier for whom the report is prepared. Every list and report will be accompanied by a transmittal letter from Mid America Computer Corporation.

To order customer lists and reports: the IPs must submit a signed and dated "Customer Information Agreement", and send their requests to the Equal Access Coordinator at Mid America Computer Corporation on a "Customer List Order Form".

CUSTOMER INFORMATION AGREEMENT

(IP) _____ agrees that customer information provided shall be used by the carrier only to inform the subscribers of ***Kennebec Telephone Company*** of the availability of equal access and/or to market the carrier's interexchange services to the subscribers of ***Kennebec Telephone Company***.

The above-noted carrier shall not sell, license, or otherwise make the information available to any other third party, or use such information supplied on behalf of ***Kennebec Telephone Company*** for any other purpose without first obtaining written permission from ***Kennebec Telephone Company***.

Kennebec Telephone Company provides their subscriber information "AS IS" with all faults. There are no warranties, express or implied, including, without limitation, any implied warranty of merchantability or fitness for a particular purpose.

Mid America Computer Corporation shall not be held liable for any claims, damages, judgments, or demands arising or resulting from the provision of customer information as covered in this agreement.

In the event this limitation of liability provision shall be determined to be unenforceable or invalid by an appropriate judicial or regulatory authority, ***Kennebec Telephone Company's*** maximum liability for error or omission hereunder shall be a refund of the price paid by the carrier for the information provided.

Mid America Computer Corporation will use its best efforts to provide timely and accurate information ordered by the IP.

Signature of Authorized Representative

Date

CUSTOMER LIST/ADDRESS ORDER FORM

To be used for required and requested lists.

Carrier _____

Contact Person _____

Contact Phone Number _____

Contact Fax Number _____

Address to be shipped to: _____

Address to be billed to: _____

Preferred transmittal:

Tape _____

Paper _____

Diskette _____

Requested lists (fee for each list: \$150.00):

_____ 2401 End users served by end office

_____ 2402 End users who have not selected an IP

_____ 2403 End users who have selected or allocated to the IP

_____ 2404 End users tentatively allocated to other IP's

_____ 2405 End users tentatively allocated to requesting IP

_____ 2406 End users subject to allocation

_____ Other (please specify TCSI)

TCSI: USED FOR REQUIRED REPORTS
PRE-CONVERSION

<u>TC</u>	<u>TRANSACTION DESCRIPTION</u>	<u>SI</u>	<u>STATUS DESCRIPTION</u>
20	Subscription Order Install	01	End user selected IP on EP ballot
		02	End user allocated
		03	End user selected IP through EP
		04	Confirmation of an IP initiated order
		11	End user selected IP through EP due to dispute over PIC selection

TCSIs USED FOR IP REQUESTED LISTS
PRE-CONVERSION

<u>TC</u>	<u>TRANSACTION DESCRIPTION</u>	<u>SI</u>	<u>STATUS DESCRIPTION</u>
24	Customer Listing	01	End users served by end office
		02	End users who have not selected an IP
		03	End users who have selected or allocated to the IP
		04	End users tentatively allocated to other IP's
		05	End users tentatively allocated to requesting IP
		06	End users subject to allocation

TCSI's USED FOR REJECTED SUBSCRIPTION ORDERS
PRE-CONVERSION
EP TO IP

<u>TC</u>	<u>TRANSACTION DESCRIPTION</u>	<u>SI</u>	<u>STATUS DESCRIPTION</u>
21	Subscription order rejected	07	Working telephone number (WTN) not found
		12	Working telephone number (WTN) numbering plan area (NPA-NXX) is invalid for EP
		22	Billing name does not match account information
		24	Billing address does not match account information
		48	Conflict on working telephone number (WTN) with ballot - ballot prevails
		49	Conflict on working telephone number (WTN) with order received through EP - EP order prevails
		53	Conflict on working telephone number (WTN) with other IP orders - EP will resolve

TCSI: ACCEPTED ON IP TO EP REPORTS

<u>TC</u>	<u>TRANSACTION DESCRIPTION</u>	<u>STATUS CODE</u>	<u>STATUS DESCRIPTION</u>
01	Pre-subscription Order	04	All working telephone numbers and terminals, if any, associated with the billing telephone number.
		05	Working telephone number only.
02	Pre-subscription Order Disconnects by IP	04	All working telephone numbers and terminals, if any, associated with the billing telephone number.
		05	Working telephone number only.
03	Pre-subscription Order Cancellations by Customer	04	All working telephone numbers and terminals, if any, associated with the billing telephone number.
		05	Working telephone number only.

CUSTOMER ACCOUNT RECORD EXCHANGE (CARE)
CONTROL HEADER RECORD LAYOUT

<u>POSITION</u>	<u>SIZE</u>	<u>DESCRIPTION</u>
1- 2	2	Record identification - Header
3- 4	2	Record identification - Direction
7-12	6	Create date
7- 8	2	Create year
9-10	2	Create month
11-12	2	Create day
13-16	4	Sequence number (0001, 0002, etc.)
17-20	4	Exchange provider (EP) identification code (1292)
21-23	3	Access carrier name abbreviation (ACNA)
24-26	3	Exchange provider (EP) revenue accounting office (RAO) (590)
27-28	2	Sequence group identifier (SE)
29-32	4	Version number (0001)

CUSTOMER ACCOUNT RECORD EXCHANGE (CARE)
CONTROL TRAILER RECORD LAYOUT

<u>POSITION</u>	<u>SIZE</u>	<u>DESCRIPTION</u>
1- 2	2	Record identification - Trailer
3- 4	2	Record identification - Direction
7-12	6	Create date
7- 8	2	Create year
9-10	2	Create month
11-12	2	Create day
13-16	4	Sequence number (0001, 0002, etc.)
17-20	4	Exchange provider (EP) identification code (1292)
21-23	3	Access carrier name abbreviation (ACNA)
24-26	3	Exchange provider (EP) revenue accounting office (RAO) (590)
27-28	2	Sequence group identifier (SE)
29-32	4	Version number (0001)
115-121	7	Grand total record count

INTEREXCHANGE PROVIDER (IP) TO EXCHANGE PROVIDER (EP)
CUSTOMER ACCOUNT RECORD EXCHANGE (CARE)
DETAIL RECORD

<u>POSITION</u>	<u>SIZE</u>	<u>DESCRIPTION</u>
1- 2	2	Transaction code
3- 4	2	Status indicator
5- 7	3	Carrier identification code (CIC)
8- 17	10	Billing telephone number - current/new
18- 20	3	Customer code - current/new
21- 30	10	Working telephone number - current/new
31- 34	4	Hunting multiline group number (HML)
35- 38	4	Terminal number - current/new
39- 44	6	Date
45	1	Customer type indicator - current/new
48	1	Customer type indicator - old
49	1	Billing name/address indicator
50- 79	30	Billing name
80-109	30	Billing name
110-139	30	Billing name
140-169	30	Billing address
170-199	30	Billing address
200-229	30	Billing address
230	1	City, state, country, zip indicator
231-260	30	City
261-285	25	State/country
286-294	9	Zip code
322-342	21	Government requisition number
343-352	10	Interexchange provider (IP) reference number
353-368	16	Interexchange provider (IP) order number
369-386	18	Exchange provider (EP) order number
369	1	Service order type
370-386	17	Service order number
387	1	Reserved filler
388-389	2	Original transaction code
390-391	2	Original status indicator
392-394	3	Previous carrier identification code (CIC)
400	1	Campaign account indicator
415-420	6	Desired due date
421-426	6	Earliest message date
427-432	6	Latest message date
433-436	4	Future carrier identification code (CIC)

EXCHANGE PROVIDER (EP) TO INTEREXCHANGE PROVIDER (IP)
CUSTOMER ACCOUNT RECORD EXCHANGE
DETAIL RECORD

<u>FIELD #</u>	<u>SIZE</u>	<u>DESCRIPTION</u>
1	2	Transaction code
2	2	Status indicator
3	3	Carrier ID code
4	10	Billing # curr/new NPA XXX LINE
6	10	Working # curr/new
10	6	Date (processing or transaction) YYMMDD
11	1	Cust. Type (B=Business, R=Residence)
12	1	Non pub or unlist (4=Normal, 3=Non pub, 2=Unlist)
13	1	Line indicator (1=Multiline, 2=Single)
15	1	Billing name and address indicator "Y"
16	30	Billing name 1
19	30	Billing addr 1
20	30	Billing addr 2
22	1	City, st, zip indicator "Y"
23	30	City
24	25	State/country
25	9	Zip code
26	10	Billing # old NPA NXX LINE
28	10	Working # old NPA NXX LINE
35	2	Original tran. code
36	2	Original status code
40	1	First ballot flag (Y/N)
41	1	1st IC rpt. Y/N
42	1	Central ofc report Y/N
43	1	2nd ballot Y/N
44	1	Allocated Y/N
45	1	2nd IC rept Y/N
46	1	Tele/data updated Y/N
47	1	PIC assignment ("Blank"=Not Assigned, A=Allocated, B=Ballot, L=Letter of Agency, S = Super Ballot)
48	8	Date stamp from system date
49	11	CLLI code
50	3	Number of access lines

ADDITIONAL TAPE INFORMATION

IBM EBCDIC 6250 BPI-

Standard IBM Label

Block Length 9600

Record Length 480

Data Set Name .NNNN.XXXX.CIC

XXXX = CSR1, CSR2, CSR3, OPTL AND EXCP

NNNN = Abbreviate TELCO Name

**N = Numeric, right justified, zero filled
(if N field is not used it will be 0 filled)**

**AN = Alphanumeric, left justified, space filled
(if AN field is not used it will be space filled)**

POST CONVERSION REPORTS AND CUSTOMER LISTS

Mid America Computer has developed an equal access program that will automatically assign TCSIs when a service order is processed in the telephone software. The philosophy behind automatically assigning transaction codes and status indicators in the equal access system is to provide the most general, generic requirements possible in a situation which could possibly include innumerable combinations. The CARE manual is subject to multiple interpretations and the individual care provider should not be put in the position of favoring a particular interexchange provider's needs at the expense of the more universal requirements of all interexchange providers.

Every automatically assigned TCSI can be over-ridden on the equal access system. The exchange provider should be able to determine a more specific code condition if needed. Care should be taken to change or not change the original TCSI as the situation warrants. Normally, however, there should be no need to override the automatically assigned codes. If an interexchange provider needs more information, a listing of the history and current information on a specific number should be sufficient. Often, it really is the case that the exchange provider cannot and should not be expected to be more specific. Reasonable re-programming is possible, however, any reprogramming should allow for the principle of usability by any interexchange carrier and conformity with the CARE manual.

The interexchange provider must be aware that the majority of reports from the exchange carrier will arrive in a paper format. The cost and availability of reports on magnetic tape may not be feasible for all companies.

The following page contains the automatically assigned transaction codes and status indicators in the MACC Equal Access System, and the conditions by which they are assigned.

POST-CONVERSION AUTOMATICALLY ASSIGNED TCSI:

TC	SI	<u>CONDITION</u>
23	17	Change but no adequate code to assign change condition
23	42	Bill Name, Address, and CTI change
23	43	Customer Type Indicator (CTI) and Billing Address change
23	26	CTI change only. If other changes (like address and/or name and/or CTI) 2317 will be assigned as the TCSI.
23	05	Bill name and address change
23	03	Bill name change only
23	02	Bill address change only
23	07	Change in published status only. If other changes (like address and/or name and/or CTI) 2317 will be assigned as the TCSI.
20	08	End user selects IP through EP - New service
20	09	Change of IP through EP of existing line. When an existing line changes Carrier ID, an extra history entry of 2201 (disconnect for unspecified reasons) is entered for later designated listing or for an entry on magnetic media.
22	01	Disconnect for any reason
22	03	Disconnect - End user canceled IP service through EP

EP TO IP CUSTOMER ACCOUNT RECORD EXCHANGE (CARE) DETAIL RECORD

POSITION	SIZE	DESCRIPTION
1- 2	2	Transaction code
3- 4	2	Status indicator
5- 7	3	Carrier identification code (CIC)
8- 17	10	Billing telephone number - current/new
18- 20	3	Customer code - current/new
21- 30	10	Working telephone number - current/new
31- 34	4	Hunting multiline group number (HML)
35- 38	4	Terminal number - current/new
39- 44	6	Date
45	1	Customer type indicator - current/new
46	1	Non-pub/non-list indicator
47	1	Line indicator
48	1	Customer type indicator - old
49	1	Billing name/address indicator
50- 79	30	Billing name
80-109	30	Billing name
110-139	30	Billing name
140-169	30	Billing address
170-199	30	Billing address
200-229	30	Billing address
230	1	City, state, country, zip indicator
231-260	30	City
261-285	25	State/country
286-294	9	Zip code
295-304	10	Billing telephone number - old
305-307	3	Customer code - old
308-317	10	Working telephone number - old
318-321	4	Terminal number - old
322-342	2	Government requisition number
343-352	10	Interexchange provider (IP) reference number
353-368	16	Interexchange provider (IP) order number
369-386	18	Exchange provider (EP) order number
369	1	Service order type
370-386	17	Service order number
387	1	Reserved filler
388-389	2	Original transaction code
390-391	2	Original status indicator
395-399	5	Standard industrial classification code (SIC)
400	1	Campaign account indicator
401	1	Special billing arrangement indicator
402	1	New responsible party indicator
406	1	Short term service indicator
407-409	3	Originating call screening code
410-414	5	Originating call screening code modifier
415-420	6	Desired due date
421-426	6	Connect date
427-432	6	Disconnect date
433-436	4	Future carrier identification code (CIC)
437-442	6	PIC activation/deactivation date
443	1	Switched data identifier
451	1	1st ballot, Y/N
452	1	1st IP report, Y/N
453	1	Cntrl o/c rpt, Y/N
454	1	2nd ballot, Y/N
455	1	Allocated, Y/N
456	1	1nd IP report, Y/N
457	1	Tel/dta updt, Y/N
458	1	PIC assignment (Blank=Not Assigned, A=Allocated, B=Ballot, L=Letter of Agency, S=Super ballot)
459-466	8	Date stamp fr sys
467-477	11	CLLI code
478-480	3	# of access lines
481-495	15	Aggregate account code
496-501	6	Taxing area
502	1	Service name/address (SNA) indicator
503-542	40	Service name
543-582	40	Service name
583-622	40	Service address
623-662	40	Service address
663	1	Service city, state, zip indicator
664-703	40	Service city
704-728	25	Service state
729-737	9	Service zip

South Dakota Public Utilities Commission
WEEKLY FILINGS
For the Period of April 15, 1999 through April 22, 1999

If you need a complete copy of a filing faxed, overnight expressed, or mailed to you, please contact
Delaine Kolbo within five business days of this filing.
Phone: 605-773-3705 Fax: 605-773-3809

ELECTRIC

EL99-004 In the Matter of the Filing by MidAmerican Energy Company for Approval of a New Street Lighting Service.

MidAmerican Energy Company is filing to revise the South Dakota Electric Tariff No. 1 to include a price code for a 100-watt High Pressure Sodium Victorian style fiberglass pole street light.

Staff Analyst: Keith Senger
Staff Attorney: Karen Cremer
Date Filed: 04/21/99
Intervention Deadline: 05/07/99

TELECOMMUNICATIONS

TC99-030 In the Matter of the FCC Order Establishing New Deadlines for Implementation of IntraLATA Dialing Parity by Local Exchange Carriers.

The following local exchange carriers have filed IntraLATA Dialing Parity Implementation Plans: Heartland Telecommunications Company of Iowa on April 20, 1999; Accent Communications, Inc. on April 20, 1999, is requesting Commission approval to send out carrier notification letters in advance of final Commission action on the proposed plan, carrier notifications completed by June 1, 1999; Splitrock Properties, Inc. on April 21, 1999, is requesting Commission approval to send out carrier notification letters in advance of final Commission action on the proposed plan, carrier notifications completed by June 1, 1999; Jefferson Telephone Company on April 21, 1999, is requesting Commission approval to send out carrier notification letters in advance of final Commission action on the proposed plan, carrier notifications completed by May 10, 1999; Venture Communications, Inc. on April 21, 1999, is requesting Commission approval to send out carrier notification letters in advance of final Commission action on the proposed plan, carrier notifications completed by June 1, 1999; Hanson County Telephone Company on April 21, 1999, is requesting Commission approval to send out carrier notification letters in advance of final Commission action on the proposed plan, carrier notifications completed by June 1, 1999; Hanson Communications, Inc. d/b/a McCook Telecom on April 21, 1999, is requesting Commission approval to send out carrier notification letters in advance of final Commission action on the proposed plan, carrier notifications completed by June 1, 1999; Vivian Telephone Company d/b/a Golden West Communications, Inc. on April 21, 1999, is requesting Commission approval to send out carrier notification letters in advance of final Commission action on the proposed plan, carrier notifications completed by June 1, 1999; Stockholm Strandburg Telephone Co. on April 22, 1999, is requesting Commission approval to send out carrier notification letters in advance of final Commission action on the proposed plan, carrier notifications completed by June 1, 1999; AT&T Communications of the Midwest, Inc. on April 22, 1999; Midco Communications on April 22, 1999; Heartland Communications, Inc. on April 22, 1999; Mobridge Telecommunications on April 22, 1999, is requesting Commission approval to send out carrier notification letters in advance of final Commission action on the proposed plan, carrier notifications completed by June 1, 1999; West River Telecommunications Cooperative on April 22, 1999, is requesting Commission approval to

Date Filed: 04/19/99
Intervention deadline: 05/07/99

TC99-040 In the Matter of the Application of Cable & Wireless Global Markets, Inc. for a Certificate of Authority to Provide Telecommunications Services in South Dakota.

Cable & Wireless Global Markets, Inc. is a reseller who intends to offer interexchange interLATA and intralATA telecommunications services on a statewide basis.

Staff Analyst: Keith Senger
Staff Attorney: Karen Cremer
Date Filed: 04/19/99
Intervention Date: 05/07/99

TC99-041 In the Matter of the Filing by Dickey Rural Telephone Cooperative and its Wholly Owned Subsidiary, Dickey Rural Communications, Inc. for Approval of Petition for Suspension and Modification of Dialing Party.

Dickey Rural Telephones Cooperative and Dickey Rural Communications, Inc. each have fewer than 2% of the Nation's subscriber lines installed in the aggregate. Pursuant to 47 U.S.C. 251(f)(2), Dickey Rural Telephone Cooperative and Dickey Rural Communications, Inc. petitions the Commission for a suspension and modification of the requirement for implementation of intralATA dialing party in its service areas until June 30, 2000. The grounds for the petition are that suspension and modification are: a) necessary to avoid imposing requirements that are unduly economically burdensome and infeasible, and b) consistent with the public interest, convenience and necessity. The compressed schedule mandated by CC Docket No. 96-98, Order adopted March 19 and released March 23, 1999, FCC 98-54 is burdensome and infeasible for small LECs to develop and administer plans for timely notification of their subscribers and interexchange carriers regarding subscribers' selection of intralATA toll providers, and for small LECs to develop fully compensatory local exchange access rates to replace the current arrangement.

Staff Analyst: Harlan Best
Staff Attorney: Karen Cremer
Date Filed: 04/19/99
Comments Due: 05/07/99
Reply Comments Due 05/17/99

TC99-042 In the Matter of the Filing by Consolidated Telephone Cooperative and its Wholly Owned Subsidiary, Consolidated Telcom, Inc. formerly known as CTC Communications, Inc. for Approval of Petition for Suspension and Modification of Dialing Party.

Consolidated Telephone Cooperative and Consolidated Telcom, Inc. formerly known as CTC Communications, Inc. each have fewer than 2% of the Nation's subscriber lines installed in the aggregate. Pursuant to 47 U.S.C. 251(f)(2), Consolidated Telephone Cooperative and Consolidated Telcom, Inc. formerly known as CTC Communications, Inc. petitions the Commission for a suspension and modification of the requirement for implementation of intralATA dialing party in its service areas until June 30, 2000. The grounds for the petition are that suspension and modification are: a) necessary to avoid imposing requirements that are unduly economically burdensome and infeasible, and b) consistent with the public interest, convenience and necessity. The compressed schedule mandated by CC Docket No. 96-98, Order adopted March 19 and released March 23, 1999, FCC 98-54 is burdensome and infeasible for small LECs to develop and administer plans for timely notification of their subscribers and interexchange carriers regarding subscribers' selection of intralATA toll providers, and for small LECs to develop fully compensatory local exchange access rates to replace the current arrangement.

Staff Analyst: Harlan Best
Staff Attorney: Karen Cremer
Date Filed: 04/20/99
Comments Due: 05/07/99
Reply Comments Due: 05/17/99

TC99-043

In the Matter of the Filing by Kennebec Telephone Company for Approval of Dialing Parity Implementation Plan and Petition for Suspension and Modification of Dialing Parity.

Kennebec Telephone Company filed its intraLATA toll dialing parity implementation plan and, pursuant to ARSD 20:10:32:39 and 47 U.S.C. 251(f)(2), a petition for suspension and modification of the requirement for implementing intraLATA dialing parity until September 19, 1999. Kennebec Telephone Company has fewer than 2% of the Nation's subscriber lines installed in the aggregate. Kennebec Telephone Company's implementation of intraLATA dialing parity in Kennebec and Presho are part and parcel of its implementation of interLATA equal access for the Kennebec and Presho exchanges at the South Dakota Network switch in Sioux Falls. The implementation of Kennebec Telephone Company's dialing parity plan began before the FCC released its order in CC Docket No. 96-98, Order adopted March 19 and released March 23, 1999, FCC 99-54.

Staff Analyst: Harlan Best
Staff Attorney: Karen Cremer
Date Filed: 04/21/99
Comments Due: 05/07/99
Reply Comments Due: 05/17/99

TC99-044

In the Matter of the Application of RDST, Inc. for a Certificate of Authority to Provide Telecommunications Services in South Dakota.

Application by RDST, Inc. for a Certificate of Authority to provide Intrastate Telecommunications Services in South Dakota. RDST, Inc. proposes to offer intrastate, interexchange 1+ and 101XXXX outbound, 800/888 inbound, travel card and prepaid card service in South Dakota.

Staff Analyst: Dave Jacobson
Staff Attorney: Camron Hoseck
Date Filed: 04/21/99
Intervention Deadline: 05/07/99

TC99-045

In the Matter of the Application of DSLnet Communications, LLC for a Certificate of Authority to Provide Telecommunications Services, Including Local Exchange Services, in South Dakota.

On April 21, 1999, the Commission received an application by DSLnet Communications, LLC for a Certificate of Authority to provide resold and facilities-based local exchange and interexchange services to subscribers throughout the state of South Dakota. Initially, DSLnet intends to provide data transmission services only.

Staff Analyst: Bob Knadle
Staff Attorney: Karen Cremer
Date Filed: 04/21/99
Intervention Deadline: 05/07/99

TC99-046

In the Matter of the Filing by Western Telephone Company for Approval of Dialing Parity Implementation Plan and Petition for Suspension and Modification of Dialing Parity.

Western Telephone Company filed its intraLATA toll dialing parity implementation plan and, pursuant to ARSD 20:10:32:39 and 47 U.S.C. 251(f)(2), a petition for suspension and modification of the requirement for implementing intraLATA dialing parity until September 15, 1999. Western Telephone Company has fewer than 2% of the Nation's subscriber lines installed in the aggregate. "Western Telephone Company seeks the suspension and modification because at this time negotiations are ongoing and no decision has yet been reached regarding whether or not intraLATA equal access will be provided by South Dakota Network as centralized equal access, or, if Western Telephone Company will make the requisite changes to provide intraLATA dialing parity from its end offices. It is technically infeasible and, hence, inconsistent with the public interest, to reach this decision and implement either alternative by July 22, 1999, the deadline according to [the FCC order in CC Docket No. 96-98, Order adopted March 19 and released March 23, 1999,] FCC 99-54." Western Telephone Company submitted a centralized intraLATA equal access plan.

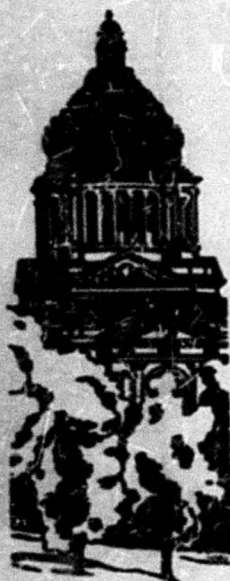
Staff Analyst: Harlan Best
Staff Attorney: Karen Cremer
Date Filed: 04/21/99
Comments Due: 05/07/99
Reply Comments Due: 05/17/99

**TC99-047 In the Matter of the Filing by Beresford Municipal Telephone Company for Approval of
Dialing Parity Implementation Plan and Petition for Suspension and Modification of
Dialing Parity.**

Beresford Municipal Telephone Company filed its intraLATA toll dialing parity implementation plan and, pursuant to ARSD 20:10:32:39 and 47 U.S.C. 251(f)(2), a petition for suspension and modification of the requirement for implementing intraLATA dialing parity until September 15, 1999. Beresford Municipal Telephone Company has fewer than 2% of the Nation's subscriber lines installed in the aggregate. "Beresford Municipal Telephone Company seeks the suspension and modification because at this time negotiations are ongoing and no decision has yet been reached regarding whether or not intraLATA equal access will be provided by South Dakota Network as centralized equal access, or, if Beresford Municipal Telephone Company will make the requisite changes to provide intraLATA dialing parity from its end offices. It is technically infeasible and, hence, inconsistent with the public interest, to reach this decision and implement either alternative by July 22, 1999, the deadline according to [the FCC order in CC Docket No. 96-98, Order adopted March 19 and released March 23, 1999,] FCC 99-54." Beresford Municipal Telephone Company submitted a centralized intraLATA equal access plan.

Staff Analyst: Harlan Best
Staff Attorney: Karen Cremer
Date Filed: 04/21/99
Comments Due: 05/07/99
Reply Comments Due: 05/17/99

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South Dakota Public Utilities Commission



State Capitol Building, 500 East Capitol Avenue, Pierre, South Dakota 57501-5070

May 7, 1999

Mr. Bill Bullard
SD Public Utilities Commission
500 East Capitol Avenue
Pierre, SD 57501

RE: Comments on Dockets TC99-030, TC99-041, TC99-042, ~~TC99-043~~ TC99-046, and TC99-047

Dear Mr. Bullard:

Enclosed are an original and 10 copies of Staff's Comments on IntraLATA Toll Dialing Parity Plans regarding the above-referenced dockets. Please file these in the appropriate dockets.

Sincerely,

Karen E. Cremer

Karen E. Cremer
Staff Attorney

Capitol Office
Telephone (605)773-3281
FAX (605)773-3889

Transportation/
Warehouse Division
Telephone (605)773-5280
FAX (605)773-3225

Consumer Hotline
1-800-332-1782

TTY Through
Relay South Dakota
1-800-877-1113

Internet Website
www.puc.state.sd.us/puc/

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Terry Norton
Gregory A. Rislov
Keith Senger
Rebecca Alita Wiest

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

IN THE MATTER OF THE FCC ORDER)	STAFF COMMENTS ON
ESTABLISHING NEW DEADLINES FOR)	INTRALATA TOLL DIALING
IMPLEMENTATION OF INTRALATA DIALING)	PARITY PLANS
PARITY BY LOCAL EXCHANGE CARRIERS)	TC99-030; TC99-041; TC99-
)	042; TC99-043; TC99-046;
)	TC99-047

On March 23, 1999, the Federal Communications Commission (FCC) issued an order establishing new deadlines for implementation of intraLATA dialing parity by local exchange carriers (LECs). In the Matters of Implementation of the Local Competition Provisions of the Telecommunications Act of 1996: Petition of Southwestern Bell Telephone Company, Pacific Bell, and Nevada Bell for Expedited Declaratory Ruling on Interstate IntraLATA Toll Dialing Parity or, in the Alternative, Various Other Relief, CC Docket No. 96-98, FCC 99-54 (released March 23, 1999). The order states that "[n]o later than April 22, 1999, all LECs must file intraLATA toll dialing parity plans with the state regulatory commission for each state in which the LEC provides telephone exchange service if a plan has not yet been filed with such state commission. Once a state commission has approved a plan, the LEC must implement its plan no later than 30 days after the date on which the plan is approved." *Id.* at ¶ 7. If the state commission has not acted on the plan by June 22, 1999, the LEC must file the plan with the Common Carrier Bureau of the FCC. *Id.*

At its March 30, 1999, meeting, the Public Utilities Commission (Commission) opened a docket in order to review intraLATA toll dialing plans and established a procedural schedule that would allow other parties to file written comment on the LECs' intraLATA toll dialing plans. No parties objected to this proposal. At its April 1, 1999, meeting, the Commission issued guidelines for LECs to follow when developing their intraLATA toll dialing plans. On the issue of cost recovery, the Commission decided that if a LEC believes that it needs cost recovery, the LEC should file for cost recovery in a separate proceeding before the Commission in accordance with FCC rules.

On April 23, 1999, the Commission faxed notice that the following companies had filed intraLATA toll dialing parity plans: Heartland Telecommunications Company of Iowa on April 20, 1999; Accent Communications, Inc. on April 20, 1999; Splitrock Properties, Inc. on April 21, 1999; Jefferson Telephone Company on April 21, 1999; Venture Communications, Inc. on April 21, 1999; Hanson County Telephone Company on April 21, 1999; Hanson Communications, Inc. d/b/a McCook Telecom on April 21, 1999; Vivian Telephone Company d/b/a Golden West Communications, Inc. on April 21, 1999; Stockholm Strandburg Telephone Co. on April 22, 1999; AT&T Communications of the Midwest, Inc. on April 22, 1999; Midco Communications on April 22, 1999; Heartland Communications, Inc. on April 22, 1999; Mobridge Telecommunications on April 22, 1999; West River Telecommunications Cooperative on April 22, 1999; Dakota Telecommunications Group, Inc., DTG Community Telephone, Inc. and Dakota Telecom, Inc. on April 22, 1999; Stateline Telecommunications, Inc. on April 22, 1999; and U S WEST Communications, Inc. on April 22, 1999.

The following local exchange carriers notified the Commission that they have completed conversion to intraLATA dialing parity: Fort Randall Telephone Company on April 21, 1999; Mt. Rushmore Telephone Company on April 21, 1999; CommChoice, LLC on April 22, 1999; and Kadoka on April 26, 1999.

Dickey Rural Telephone Cooperative, Dickey Rural Communications, Inc. Consolidated Telephone Cooperative and Consolidated Telcom, Inc. formerly known as CTC Communications, Inc. petitioned the Commission for a suspension and modification of the requirement for implementation of intraLATA dialing parity in its service areas until June 30, 2000.

Kennebec Telephone Company filed its intraLATA toll dialing parity implementation plan and, pursuant to ARSD 20:10:32:39 and 47 U.S.C. 251(f)(2), a petitioned for suspension and modification of the requirement for implementing intraLATA dialing parity until September 19, 1999.

Western Telephone Company filed its intraLATA toll dialing parity implementation plan and, pursuant to ARSD 20:10:32:39 and 47 U.S.C. 251(f)(2), a petition for suspension and modification of the requirement for implementing intraLATA dialing parity until September 15, 1999.

Beresford Municipal Telephone Company filed its intraLATA toll dialing parity implementation plan and, pursuant to ARSD 20:10:32:39 and 47 U.S.C. 251(f)(2), a petition for suspension and modification of the requirement for implementing intraLATA dialing parity until September 15, 1999.

COMMISSION STAFF'S RECOMMENDATION

Commission Staff has reviewed the toll dialing parity plans filed by the aforementioned companies utilizing the guidelines as established by the Commission in its April 1, 1999, order. Staff then categorized the companies and will make its recommendations using these categories.

SDN COMPANIES

Heartland Communications Inc., Accent Communications, Inc., Splitrock Properties, Inc., Venture Communications, Inc., Hanson County Telephone Company, Hanson Communications, Inc. d/b/a McCook Telecom, Stockholm Strandburg Telephone Co., Mobridge Telecommunications, Stateline Telecommunications, Inc., Vivian Telephone Company d/b/a Golden West Communications, Inc. all requested Commission approval to send out its carrier notification letters in advance of final Commission action on the proposed plan with the carrier notifications completed by June 1, 1999. Staff would recommend that the Commission grant the companies approval to send out its carrier notification letter (Appendix A and B) in advance of final Commission action on the proposed plan. Staff would further recommend that the language in the customer notification letter (Appendix C) be amended to state that the customer, if they choose to change their intraLATA long distance carrier, directly contact the

long distance company that they have chosen in order to initiate that change with the LEC. This will not only allow the customer to pick a plan that best suits their needs but it will ensure that a LOA is processed or that third-party verification will occur.

Staff would also recommend that Accent Communications, Inc.'s letter to its customers (Appendix C) include a statement that after the 60 day grace period has expired, that there will be a charge to change carriers and the letter should state the amount of the charge.

Heartland Communications, Inc. did not file a customer letter (Appendix C) that was company specific. Staff would recommend that the company file such a letter before final approval of the plan.

Jefferson Telephone Company has filed an amendment to its plan asking that its carrier notification letter be approved no later than May 14, 1999. Staff would recommend approval of this amendment.

Staff would note that none of the aforementioned companies addressed the issue of pay phones in their plans and Staff would recommend that they amend their filing to address this issue.

END OFFICE

Dakota Telecommunications Group, Inc., DTG Community Telephone, Inc. and Dakota Telecom, Inc. and West River Telecommunications Cooperative requested Commission approval to send out its carrier notification letters in advance of final Commission action on the proposed plan. Staff would recommend that the Commission grant the companies approval to send out its carrier notification letter (Appendix A for both companies and also Appendix B for West River) in advance of final Commission action on the proposed plan. Staff would further recommend that the language in the customer notification letter be amended to state that the customer, if they choose to change their intraLATA long distance carrier, directly contact the long distance company that they have chosen in order to initiate that change with the LEC. This will not only allow the customer to pick a plan that best suits their needs but it will ensure that a LOA is processed or that third-party verification will occur.

Staff would note that neither of the aforementioned companies addressed the issue of pay phones in their plans and Staff would recommend that they amend their filing to address this issue.

U S WEST

U S WEST Communications, Inc. requested Commission approval to send out its carrier notification letters in advance of final Commission action on the proposed plan. Staff would recommend that the Commission grant the company approval to send out its carrier notification letter in advance of final Commission action on the proposed plan.

U S WEST has stated in its filing that it will file a waiver with the FCC requesting an extension of time to implement toll dialing parity in the McIntosh, Timber Lake and Morristown exchanges. According to the Commission's order setting forth the guidelines to be followed, U S WEST is to describe how it will offer dialing parity *for each exchange* and its proposed time schedule. U S WEST has not listed its exchanges nor has it asked this Commission for a waiver to extend the time to implement toll dialing parity in the McIntosh, Timber Lake, and Morristown exchanges. **Staff recommends that U S WEST list the exchanges individually with the NXX provided so that carriers know which exchanges are included and that U S WEST's toll dialing parity plan be applied to all its exchanges within the state.**

In U S WEST's customer notification letter (Exhibit A), U S WEST requires the customer to contact U S WEST to remove the "pic freeze" prior to selecting an intraLATA carrier if it is a carrier other than U S WEST. Since this is the first time a customer can select an intraLATA carrier there should be no "freeze" associated with intraLATA long distance. **Staff would recommend that U S WEST be required to remove this paragraph from the customer letter.**

When taking orders from new or existing customers U S WEST proposes to respond to a customer's request for further information as to U S WEST's toll products and services at that time. **Staff would recommend that should a customer request further information as to U S WEST's toll products and services that the customer be transferred to U S WEST's marketing/sales representatives.**

U S WEST's plan allows customers to change their intraLATA carrier one time free of charge during the first 30 days following implementation. **Staff would recommend that the grace period be a minimum of 60 days. This would allow the customer to receive at least one bill from the intraLATA carrier.**

U S WEST is requesting that MTS be classified as fully competitive effective July 22, 1999. **Staff would recommend denial of this request. Such a request should be considered in a separate docket.**

AT&T

Staff would recommend that AT&T make a full disclosure to new and existing customers that if they do not indicate a preference for an alternate carrier, that the customer's traffic will by default go to AT&T. Staff would also recommend that AT&T remove from the customer letter (Exhibit 1) the requirement that the customer who wishes to change carriers, that they contact AT&T's business office first.

Staff would recommend that the language in the customer notification letter (Exhibit 1) be amended to state that the customer, if they choose to change their intraLATA long distance carrier, directly contact the long distance company that they have chosen in order to initiate that change with the LEC. The letter should include a list of long distance providers to choose from and their toll free numbers

so that the customer can contact the long distance companies. This will not only allow the customer to pick a plan that best suits their needs but it will ensure that a LOA is processed or that third-party verification will occur.

Staff would note that AT&T did not address the issue of pay phones in its plan and Staff would recommend that it amend its filing to address this issue.

MIDCO

Staff would recommend that the customer notification letter (Exhibit A) be re-written to be "more customer friendly" and less technical. The letter should have the customer directly contact the long distance company and should include a list of long distance providers to choose from and their toll free numbers so that the customer can contact the long distance companies and decide which rate plan best suits their needs. This will ensure that a LOA is processed or that third-party verification will occur. Also Midco should be definitive as to whether or not there will be a PIC charge.

Staff would note that Midco did not address the issue of pay phones in its plan and Staff would recommend that it amend its filing to address this issue.

FOREIGN

Heartland Telecommunications Company of Iowa filed its plan without including its exchanges and NXX numbers, carrier notification letter, and customer notification letter. Staff would recommend that these documents be filed before final approval of the plan.

Staff would note that Heartland did not address the issue of pay phones in its plan and Staff would recommend that it amend its filing to address this issue.

SUSPENSION AND MODIFICATION

Dickey Rural Telephone Cooperative, Dickey Rural Communications, Inc., Consolidated Telephone Cooperative and Consolidated Telcom, Inc. formerly known as CTC Communications, Inc., Kennebec Telephone Company, Western Telephone Company, and Beresford Municipal Telephone Company all filed their toll dialing parity plans requesting suspension and modification of its plan.

Dickey Rural Telephone Cooperative, Dickey Rural Communications, Inc., Consolidated Telephone Cooperative and Consolidated Telcom, Inc. formerly known as CTC Communications, Inc. state that suspension and modification are necessary to avoid imposing requirements that are unduly economically burdensome and infeasible, and that suspension and modification are consistent with the public interest, convenience and necessity. Staff would recommend denial of suspension and modification as Dickey Rural Telephone Cooperative, Dickey Rural Communications, Inc., Consolidated Telephone Cooperative and Consolidated Telcom, Inc. formerly known as CTC

Communications, Inc. did not prove in its filing that providing intraLATA toll dialing parity requires suspension and modification and require the companies to file intraLATA toll dialing parity plans consistent with the Commission's prior orders.

Kennebec Telephone Company began implementing intraLATA dialing parity in conjunction with its implementation of interLATA dialing parity the day before the FCC issued its order ordering LEC's to implement intraLATA toll dialing parity. Kennebec states in its petition that to alter the plan already in process would be unduly economically burdensome, technically infeasible, and inconsistent with public interest. **Staff would recommend that granting approval of Kennebec's petition for suspension and modification until September 19, 1999.**

Western Telephone Company and Beresford Municipal Telephone Company filed their intraLATA toll dialing parity plans requesting suspension and modification due to ongoing negotiations and no decisions being reached regarding whether or not intraLATA dialing parity will be provided by SDN as centralized equal access or if it will be provided from its end offices. **Staff would recommend granting approval of Western's petition for suspension and modification until September 15, 1999. Staff would further recommend that the language in the customer notification letter (Appendix C) be amended to state that the customer, if they choose to change their intraLATA long distance carrier, directly contact the long distance company that they have chosen in order to initiate that change with the LEC. This will not only allow the customer to pick a plan that best suits their needs but it will ensure that a LOA is processed or that third-party verification will occur.**

Staff would note that none of the aforementioned companies, with the exception of Kennebec, addressed the issue of pay phones in their plans and **Staff would recommend that they amend their filing to address this issue.**

MISCELLANEOUS

Valley Cable & Satellite Communications, Inc. sent a copy of a customer letter to the Commission on March 26, 1999. Sancom, Inc. sent the Commission a copy of its carrier letter on April 1, 1999. **Staff would recommend that the companies file a letter with the Commission confirming that they offer intraLATA toll dialing parity and the date of such offering.**

NON-RESPONDENTS

Staff would note that the following LECs did not file any plans with the Commission:

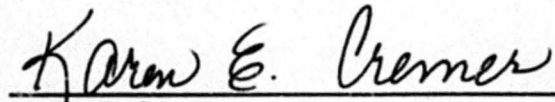
1. Farmers Mutual Telephone Cooperative, Ellendale, ND
2. GTE of Minnesota, Minneapolis, MN
3. Great Plains Communications, Blair, NE
4. RT Communications, Inc., Worland WY
5. Red River Telecom, Inc., Abercrombie, ND
6. Three River Teleco, Lynch, NE

7. U S WEST Communications of Iowa
8. U S WEST Communications of Nebraska
9. U S WEST Communications of Minnesota
10. Valley Telephone Company, Browns Valley, MN
11. NebCom, Inc. Jackson, NE
12. Baltic Telecom Cooperative, Baltic, SD
13. Brookings Municipal Utilities, Brookings, SD
14. Interstate Telephone Cooperative, Clear Lake, SD
15. James Valley Cooperative Telephone, Groton, SD
16. McCook Cooperative Telephone Company, Salem, SD
17. Midstate Telephone Company, Kimball, SD
18. Sanborn Telephone Cooperative, Woonsocket, SD
19. Sioux Valley Telephone Company, Dell Rapids, SD
20. Splitrock Telecom Cooperative, Inc., Garretson, SD
21. Sully Buttes Telephone Cooperative, Highmore, SD
22. Tri-County Mutual Telephone Company, Emery, SD
23. Valley Telecommunications Cooperative, Herreid, SD
24. Golden West Telecommunications Cooperative, Inc., Wall, SD
25. West River Cooperative Telephone Company, Bison, SD
26. Cheyenne River Sioux Tribe Telephone Authority, Eagle Butte, SD
27. Atlas Communications, Ltd., Denver, CO
28. Black Hills FiberCom, LLC, Rapid City, SD
29. Crystal Communications, Inc., Mankato, MN
30. Dakota Telecommunications, Inc., Irene, SD
31. Easton Telecom Services, Inc., Richfield, OH
32. Eclipse Communications Corporation, Issaquah, WA
33. Excel Telecommunications, Inc., Dallas, TX
34. F.D.S.D. Rapid City, Inc., Rapid City, SD
35. FiberComm, L.C., LeMars, IA
36. FirstTel, Inc., Sioux Falls, SD
37. GLD, Group Long Distance, Inc., Fort Lauderdale, FL
38. LCI International Telecom Corporation, McLean, VA
39. LDM Systems, Inc., New City, NY
40. MCImetro Access Transmission Services, Inc., Vienna, VA
41. McLeodUSA Telecommunications Services, Inc., Cedar Rapids, IA
42. Northern Valley Communications, L.L.C., Bath, SD
43. PAM Oil Inc. d/b/a PAM Communications, Sioux Falls, SD
44. Quintelco, Inc., Pearl River, NY
45. Sioux Falls Cable Television, Sioux Falls, SD
46. Sprint Communications Company L.P., Kansas City, MO
47. Sterling International Funding, Inc. d/b/a Reconex, Hubbard, OR
48. Telco Holdings, Inc. d/b/a Dial & Save, Chantilly, VA
49. Tel-Save, Inc. d/b/a The Phone Company, Inc., New Hope, PA
50. WorldCom Technologies, Jackson, MS
51. Bridgewater-Canistota Independent Telephone Company, Hartford, SD
52. RC Communications, Inc., New Effington, SD
53. East Plains Telecom, Inc., Baltic, SD

- 54. Roberts County Telephone Cooperative Association, New Effington, SD
- 55. Union Telephone Company, Hartford, SD
- 56. Armour Independent Telephone Company, Armour, SD
- 57. Faith Municipal Telephone, Faith, SD

Staff would recommend that these companies file a letter with the Commission stating the date that it began offering intraLATA toll dialing parity in South Dakota.

Dated this 7th day of May, 1999.



Karen E. Cremer
Staff Attorney
South Dakota Public Utilities Commission
500 East Capitol
Pierre, SD 57501
Telephone (605) 773-3201

SDITC

**South Dakota Independent
Telephone Coalition, Inc.**

Richard D. Colt
Executive Director
rcsditc@sd.cybernet.net

May 17, 1999

RECEIVED

MAY 17 1999

**SOUTH DAKOTA PUBLIC
UTILITIES COMMISSION**

Bill Bullard, Executive Director
South Dakota Public Utilities Commission
State Capitol Building
500 East Capitol Building
Pierre, South Dakota 57501

RE: Dockets TC99-030, TC99-043, YC99-046 and TC99-047
(Implementation Plans for IntraLATA Dialing Parity)

Dear Bill:

SDITC submits this letter on behalf of its member LECs that have recently filed IntraLATA Dialing Parity Plans (hereinafter referred to as "Implementation Plans") for Commission approval. This includes the following local exchange carriers (LECs):

Accent Communications, Inc.
Splitrock Properties, Inc.
Jefferson Telephone Company
Venture Communications, Inc.
Hanson County Telephone Company
Hanson Communications, Inc.
Vivian Telephone Company
Stockholm-Strandburg Telephone Co.
Heartland Communications, Inc.
Mobridge Telecommunications
West River Telecommunications Cooperative
Stateline Telecommunications, Inc.
Kennebec Telephone Company
Western Telephone Company
Beresford Municipal Telephone Company

Specifically, this letter is filed in response to Staff comments dated May 7, 1999, filed in the above referenced Dockets.

All of the SDITC member companies that have filed "Implementation Plans" with the Commission concur with the Staff comments and offer to amend their Implementation Plans in accord with the Staff recommendations.



Staff first recommends that the language in the proposed "customer notification letter" (Appendix C) be amended to state that if the customer chooses to change intraLATA long distance carriers, the customer should directly contact the long distance company that he/she has chosen in order to initiate that change. The SDITC member LECs share Staff's concerns and also believe customers would be better served by contacting the long distance carrier selected if they wish to make a change in their IntraLATA long distance service. This will ensure (1) that consumers receive applicable rate information prior to making their carrier selection; and (2) that any preferred carrier change order is properly verified consistent with the FCC rules addressing changes in preferred telecommunications service providers (47 C.F.R. §§ 64.1150, 64.1160, and 64.1100).

Staff further notes that none of the SDITC member LECs, other than Kennebec Telephone Company, have indicated how payphone station lines will be treated in the IntraLATA dialing parity conversion process. The SDITC member LECs agree with Staff, that payphone lines should also be addressed.

In response to the Staff concerns, each of the SDITC member companies affected offers to revise its Implementation Plan (by revising Sections 5 & 6 of the Plan and Appendix C, the customer notification letter) as set forth below. To illustrate these proposed revisions, the Stateline Telecommunications, Inc. Plan is used as an example.

Revise Section 5 of the Plan as follows:

5. Interexchange carrier "carrier" notification.

All carriers certified in South Dakota to provide long distance services will be notified by June 1, 1999, of the conversion to intraLATA toll dialing parity (a sample copy of the carrier notification letter to be used is attached hereto as Appendix A). These carriers will be asked to respond by June 16, 1999, if they want to participate in the intraLATA toll presubscription process (a sample copy of the form which carriers will complete to indicate their participation in the presubscription process is attached hereto as Appendix B). ~~For those eCarriers that choose to participate in the presubscription process, shall submit verified preferred carrier change orders to Stateline Telecommunications, Inc. to effectuate requests by subscribers for their intraLATA toll service information regarding customer choices will be forwarded by the local exchange carrier to the participating carriers through the "Customer Account Record Exchange" ("CARE") process in place today for exchanging information regarding interLATA toll selections. The CARE process allows for regular reporting via magnetic tape or facsimile transmission of customer carrier selections between local exchange carriers and long distance carriers.~~

Stateline Telecommunications, Inc. will also provide a summary report that will list all carrier selections received for the long distance carrier for whom the report is prepared. This report will be mailed to each participating long distance carrier in advance of the intraLATA dialing parity implementation date.

Stateline Telecommunications, Inc. will make available preconversion customer name and address lists. These customer lists are available to assist participating carriers in their presubscription solicitation efforts. These lists may be provided subject to a reasonable non-discriminatory fee, with delivery contingent upon the carrier meeting all requirements for participation in the intraLATA presubscription process.

Revise Section 6 A of the Plan as follows:

6. Customer notification.

A. Current customers.

Customers, including payphone service providers, will be notified of the conversion to intraLATA toll dialing parity by letter postmarked by no later than June 25, 1999. In such letter, customers will be advised of their intraLATA choices. Customers will be given the option to remain with their existing intraLATA 1+ carrier, Express Communications, or to choose a different intraLATA carrier for their 1+ service. The letter will include a list indicating all carriers in addition to the existing 1+ carrier that have chosen to participate in the intraLATA toll presubscription process (a sample copy of the customer notification letter that will be used is attached hereto as Appendix C).

~~Stateline Telecommunications, Inc. will include with the customer notification letter a customer response form (a sample copy of the customer response form to be used is attached hereto as Appendix D).~~ Customers will be advised that if they choose a carrier other than their existing intraLATA 1+ carrier, they must fill out and return the response form postmarked by July 12, 1999 directly contact the long distance company that they've chosen in order to initiate that change. Those customers choosing to stay with their existing intraLATA 1+ carrier, will not have to ~~return the response form take any action.~~ Their intraLATA 1+ service will remain with their current provider. Based on ~~the customer response forms received and any~~ letters of agency received directly from participating carriers, Stateline Telecommunications, Inc., as of the date and time that intraLATA dialing parity is implemented, will execute all necessary carrier selection changes.

Customers will not be charged for making any change to their intraLATA 1+ carrier during the presubscription process. In addition, customers will be advised that they will be given 60 days after the intraLATA toll dialing parity implementation date to change their intraLATA 1+ carrier at no charge.

Revise the customer notification letter (Appendix C) as follows:

To: All Customers of
Stateline Telecommunications, Inc.

Stateline Telecommunications, Inc. is pleased to announce that effective July 22, 1999, we will make it possible for you to choose from various long distance companies for your in-state 1+ long distance service (intraLATA long distance service). This service includes all of your intrastate long distance calls made by dialing 1 plus the area code and local telephone number. With these changes, you will have the ability to select a long distance company for your in-state 1+ long distance service.

In conjunction with making these changes, Stateline Telecommunications, Inc. is asking all of its local exchange subscribers to choose whether they wish to retain the current long distance company providing their in-state 1+ long distance service or select another company for the service.

Currently, Express Communications provides your in-state 1+ long distance service. This company will continue to provide service to you unless you tell us to make a change and select another carrier. If you do nothing, your in-state 1+ long distance service will remain with Express Communications.

Attached is a list of long distance companies, in addition to Express Communications, that have agreed to provide 1+ in-state long distance services in your area. ~~If you would like one of these other companies to provide your service, please complete the customer response form that is also attached and return it to our business office postmarked by no later than July 12, 1999 wish to~~ change your 1+ in-state (intraLATA) long distance carrier, you must directly contact the long distance company that you've chosen in order to initiate that change.

You will not be charged for making a change to your existing in-state 1+ long distance service in response to this notice. In addition, for a period of 60 days after July 22, 1999, you may decide to change your in-state 1+ long distance carrier, one time, at no charge. After September 20, 1999, you will incur a Primary Interexchange Carrier (PIC) charge of \$5.00 for changing carriers.

Please call our office at 605-244-5236 if you have any questions on this matter.

Sincerely,

Darrell D. Henderson, General Manager

Revise the "List" of participating long distance carriers attached to the customer notification letter as follows:

LIST

Listed below are the other long distance companies that are willing to offer you intraLATA 1+ (generally in-state) long distance services. If you wish to change your intraLATA 1+ long distance carrier, please ~~complete the attached form and return it postmarked by July 12, 1999, to Stateline Telecommunications, Inc. P.O. Box 39, Bison, South Dakota 57620~~ directly contact the long distance company that you've chosen in order to initiate that change.

*ABC Telephone Company, Inc.
Bus/Res: 1-800-555-1234*

*LMNOP Telecommunications
Bus: 1-800-55-2345*

*ZXC Telephone Company
Bus/Res: 1-800-555-3456*

Additionally, in accord with the Staff recommendations, each company proposes to remove completely from its Plan the "Customer Response Form" (Appendix D). This form would obviously not be necessary if customers are asked to directly contact their chosen long distance carrier.

I should further note that regarding the Staff recommendations seeking minor revisions to the customer notification letters proposed by Heartland Communications, Inc. and Accent Communications, Inc., these companies will revise their plans further to address these additional recommendations.

The SDITC member LECs will file revised Implementation Plans incorporating the above revisions, provided these revisions are found acceptable to the Commission.

Sincerely,



Richard D. Coft
Executive Director

TELEC CONSULTING RESOURCES

909 N. 96th Street, Suite 203
Omaha, NE 68114-2508
(402) 398-0062
FAX (402) 398-0065

Cornhusker Plaza
301 S. 13th Street, Suite 401
Lincoln, NE 68508
(402) 441-4316
FAX (402) 441-4317

June 17, 1999

Mr. Bill Bullard, Executive Director
South Dakota Public Utilities Commission
State Capitol Building
500 East Capitol Avenue
Pierre, South Dakota 57501

RECEIVED

JUN 18 1999

SOUTH DAKOTA PUBLIC
UTILITIES COMMISSION

RE: Docket TC99-043/Implementation Plan for IntraLATA Dialing Parity

Dear Mr. Bullard:

Pursuant to the intraLATA dialing parity plan requirements detailed in South Dakota Public Utilities Commission order TC99-030 issued June 15, 1999, on behalf of our client, Kennebec Telephone Company (Kennebec), we are submitting clarifications to be included with its intraLATA toll dialing parity implementation plan. These clarifications are listed below:

- Payphone provider customers are included in the presubscription process.
- 1+ Directory Assistance calls are included in the presubscription process.
- Customers wanting a PIC freeze must give Kennebec Telephone Company separate authorizations to freeze their interLATA PIC and their intraLATA PIC.

Please give Loretta Calabro or me a call at (402)398-0062 with any questions you may have on Kennebec's plan.

Thank you.

Sincerely,



Lee Darrington

cc: Rod Bowar, Kennebec Telephone Company

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

IN THE MATTER OF THE FILING BY)	ORDER GRANTING
KENNEBEC TELEPHONE COMPANY FOR)	PETITION FOR
APPROVAL OF DIALING PARITY)	SUSPENSION AND
IMPLEMENTATION PLAN AND PETITION FOR)	MODIFICATION
SUSPENSION AND MODIFICATION OF)	
DIALING PARITY)	TC99-043

On April 21, 1999, Kennebec Telephone Company (Kennebec Telephone) filed with the Public Utilities Commission (Commission) for approval of its dialing parity implementation plan and, pursuant to ARSD 20:10:32:39 and 47 U.S.C. 251(f)(2), a petition for suspension and modification of the requirement for implementing intraLATA dialing parity until September 19, 1999. Kennebec Telephone has fewer than 2% of the nation's subscriber lines installed in the aggregate. Kennebec Telephone's implementation of intraLATA dialing parity in Kennebec and Presho is a part of its implementation of interLATA equal access for the Kennebec and Presho exchanges at the South Dakota Network switch in Sioux Falls. The implementation of Kennebec Telephone's dialing parity plan began before the FCC released its order in CC Docket No. 96-98, Order adopted March 19 and released March 23, 1999, FCC 99-54. Kennebec stated that "[t]o try to alter the plan already in process would be unduly economically burdensome, technically infeasible, and certainly not consistent with the public interest. Therefore, Kennebec Telephone Company seeks the suspension and modification to allow intraLATA dialing parity to be implemented according to the plan already in process."

The Commission requested comments on Kennebec Telephone's petition for suspension and modification. No parties opposed granting the petition and Commission Staff recommended granting the petition.

At its June 15, 1999, meeting, the Commission considered whether to grant the petition. The Commission has jurisdiction over this matter pursuant to SDCL 49-31-80 and 49-31-81, ARSD 20:10:32:39, and the federal Telecommunications Act of 1996, specifically §§ 251 and 252. The Commission voted unanimously to grant the petition for suspension and modification of the requirement for implementing intraLATA dialing parity until September 19, 1999. The Commission finds, pursuant to SDCL 49-31-81 and section 251(f)(2), that the suspension and modification is necessary to avoid imposing a requirement that is unduly economically burdensome and technically infeasible since Kennebec Telephone is already in the process of implementing intraLATA and interLATA dialing parity. The Commission further finds that the suspension and modification is consistent with the public interest, convenience and necessity. In making this determination, the Commission notes that the suspension and modification is for a short time period. It is therefore

ORDERED, that Kennebec Telephone's petition for suspension and modification of the requirement for implementing intraLATA dialing parity until September 19, 1999, is granted.

Dated at Pierre, South Dakota, this 22nd day of June, 1999.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that this document has been served today upon all parties of record in this docket, as listed on the docket service list, by facsimile or by first class mail, in properly addressed envelopes, with charges prepaid thereon.

By: Delaine Kaebo

Date: 6/23/99

(OFFICIAL SEAL)

BY ORDER OF THE COMMISSION:

James A. Burg
JAMES A. BURG, Chairman

Pam Nelson
PAM NELSON, Commissioner

Laska Schoenfelder
LASKA SCHOENFELDER, Commissioner

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

IN THE MATTER OF THE FILING BY)	ORDER APPROVING
KENNEBEC TELEPHONE COMPANY FOR)	DIALING PARITY
APPROVAL OF DIALING PARITY)	IMPLEMENTATION PLAN
IMPLEMENTATION PLAN AND PETITION FOR)	
SUSPENSION AND MODIFICATION OF)	TC99-043
DIALING PARITY)	

On April 21, 1999, Kennebec Telephone Company (Kennebec Telephone) filed with the Public Utilities Commission (Commission) for approval of its dialing parity implementation plan and, pursuant to ARSD 20:10:32:39 and 47 U.S.C. 251(f)(2), a petition for suspension and modification of the requirement for implementing intraLATA dialing parity until September 19, 1999. Kennebec Telephone has fewer than 2% of the nation's subscriber lines installed in the aggregate. Kennebec Telephone's implementation of intraLATA dialing parity in Kennebec and Presho is a part of its implementation of interLATA equal access for the Kennebec and Presho exchanges at the South Dakota Network switch in Sioux Falls. The implementation of Kennebec Telephone's dialing parity plan began before the FCC released its order in CC Docket No. 96-98, Order adopted March 19 and released March 23, 1999, FCC 99-54. Kennebec stated that "[t]o try to alter the plan already in process would be unduly economically burdensome, technically infeasible, and certainly not consistent with the public interest. Therefore, Kennebec Telephone Company seeks the suspension and modification to allow intraLATA dialing parity to be implemented according to the plan already in process."

The Commission requested comments on Kennebec Telephone's petition for suspension and modification. No parties opposed granting the petition and Commission Staff recommended granting the petition.

At its June 15, 1999, meeting, the Commission considered whether to grant the petition. The Commission has jurisdiction over this matter pursuant to SDCL 49-31-80 and 49-31-81, ARSD 20:10:32:39, and the federal Telecommunications Act of 1996, specifically §§ 251 and 252. The Commission voted unanimously to grant the petition for suspension and modification of the requirement for implementing intraLATA dialing parity until September 19, 1999. The Commission found, pursuant to SDCL 49-31-81 and section 251(f)(2), that the suspension and modification is necessary to avoid imposing a requirement that is unduly economically burdensome and technically infeasible since Kennebec Telephone is already in the process of implementing intraLATA and interLATA dialing parity. The Commission further found that the suspension and modification is consistent with the public interest, convenience and necessity. In making this determination, the Commission noted that the suspension and modification is for a short time period.

At its June 15, 1999, meeting, the Commission set certain requirements for intraLATA dialing plans. See, *In the Matter of the FCC Order Establishing New Deadlines for Implementation of IntraLATA Dialing Parity by Local Exchange Carriers, Order Setting Requirements for Plans*, Docket TC99-030. At its June 22, 1999, meeting, the Commission considered whether to approve Kennebec Telephone's plan. The Commission voted unanimously to approve the intraLATA dialing parity implementation plan. The Commission finds the plan complies with the applicable FCC and Commission orders.

It is therefore

ORDERED, that Kennebec Telephone's dialing parity implementation plan is approved.

Dated at Pierre, South Dakota, this 22nd day of June, 1999.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that this document has been served today upon all parties of record in this docket, as listed on the docket service list, by facsimile or by first class mail, in properly addressed envelopes, with charges prepaid thereon.

By: *Melvin Kelbo*

Date: 6/23/99

(OFFICIAL SEAL)

BY ORDER OF THE COMMISSION:

James A. Burg
JAMES A. BURG, Chairman

Pam Nelson
PAM NELSON, Commissioner

Laska Schoenfelder
LASKA SCHOENFELDER, Commissioner

TC 99-043

Kennebec Telephone Company, Inc.
Rod Bowar, President/Manager
PO Box 158
Kennebec SD 57544
605.869.2220
Fax 605.869.2221

RECEIVED

AUG 11 1999

SOUTH DAKOTA PUBLIC
UTILITIES COMMISSION

August 9, 1999

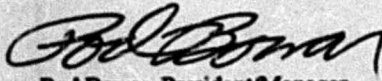
Mr. Bill Bullard,
South Dakota Public Utilities Commission
500 East Capitol
Pierre, SD 57501

Dear Mr. Bullard,

I am writing to inform the South Dakota Public Utilities Commission that effective September 19, 1999, Kennebec Telephone Company will "brand" Express Communications, the long distance offering of the South Dakota Network (SDN), as **Kennebec Long Distance**. This branding coincides with Kennebec Telephone Company's conversion to SDN and its implementation of intraLATA dialing parity.

Anyone with any questions regarding this matter should call our office at 605-869-2220.

Sincerely,



Rod Bowar, President/Manager
Kennebec Telephone Co. Inc.