

STATE OF SOUTH DAKOTA
BROWN COUNTY



OFFICE OF THE STATES ATTORNEY
BROWN COUNTY COURTHOUSE
ABERDEEN, SD 57401
(605) 626-7130

November 12, 2002

RECEIVED

NOV 13 2002

**SOUTH DAKOTA PUBLIC
UTILITIES COMMISSION**

Ms. Karen Cremer
Public Utilities Commission
500 East Capitol
Pierre, SD 57501

FAX Received NOV 12 2002

Re: In the Matter of the Filing by Qwest Corp. for Approval of Revisions
To it's Exchange and network Services Tariff

Dear Karen:

Please find enclosed the original and 10 copies of Brown County's Petition to Intervene in regards to the above entitled matter. I have faxed and mailed a copy of the same to Qwest.

If you have any questions, please contact me.

Best regards,

James A. Billion fax 626-7132

James A. Billion
Deputy States Attorney
JAB:pre

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA

RECEIVED

NOV 13 2002

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SOUTH DAKOTA PUBLIC
UTILITIES COMMISSION

IN THE MATTER OF THE FILING)
BY QWEST CORPORATION FOR)
APPROVAL OF REVISIONS TO)
ITS EXCHANGE AND NETWORK)
SERVICES TARIFF)

TC02-174
BROWN COUNTY'S
PETITION TO INTERVENE

FAX Received NOV 12 2002

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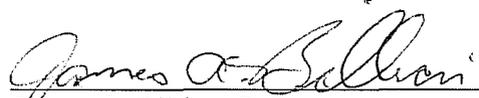
COMES NOW James A. Billion, Deputy State's Attorney for the County of Brown, State of South Dakota, and, in accordance with A.R.S.D. 20:10:01:15.02, hereby moves the Commission for leave to intervene in the above captioned matter.

This Petition is based on the following:

On October 28, 2002, Qwest Corporation filed with the South Dakota PUC changes to its Exchange and Network Services Tariff. The filing introduces new service options for wireless E911 connectivity in South Dakota providing Phase I and Phase II Selective Routing/Automatic Location Identification (SR/ALI). An effective date of November 28, 2002 was requested.

Such changes will directly and immediately affect the pecuniary interests of Brown County and therefore I respectfully request this petition be granted.

Dated this 12 day of November, 2002.


James A. Billion, Deputy
Brown County State's Attorney

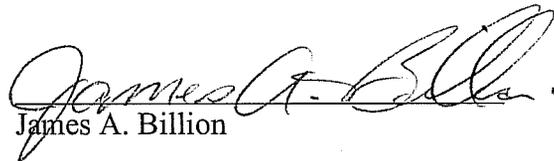
CERTIFICATE OF SERVICE BY MAIL

The undersigned hereby certifies that he served a copy of this legal document upon the person hereinafter next designated, all on the date shown below, by depositing a copy thereof in the United States mail, Aberdeen, South Dakota, postage prepaid in an envelope addressed to

Qwest Corporation
ATTN: Legal Department
1801 California Street, Suite 3800
Denver, CO 80202

Qwest Corporation
ATTN: Legal Department
612 MT Rushmore Road
Rapid City, SD 57701

Dated this 12 day of November, 2002.


James A. Billion