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August 18, 2005

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RECEIVED

AUG 18 2005

SOUTH DAKOTA PUBLIC
UTILITIES COMMISSION

RE: LNP PETITIONS; REQUESTED EXTENSIONS
Docket TC05-137
Our file: 0053

Dear Pam:

Accompanying this letter are an original and 10 copies of a petition for intervention in the captioned docket. Please file the enclosures. Service has been made upon counsel for petitioners and upon the service list as it presently exists.

Yours truly,

MAY, ADAM, GERDES & THOMPSON LLP



DAVID A. GERDES

DAG:mw

Enclosures

cc/enc: Service List
Nancy Vogel
Mary Lohnes

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AUG 18 2005

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF SOUTH DAKOTA

SOUTH DAKOTA PUBLIC
UTILITIES COMMISSION

IN THE MATTER OF THE PETITIONS) DOCKET TC05-137
FOR SUSPENSION OR MODIFICATION)
OF 47 U.S.C. § 251(b)(2) OF) MIDCONTINENT'S
THE COMMUNICATIONS ACT OF) PETITION TO
1934 AS AMENDED) INTERVENE

Pursuant to ARSD 20:10:01:15.02 Midcontinent Communications ("Midcontinent") by its undersigned counsel petitions the Commission as follows:

1. Midcontinent is a certificated telecommunications Company under the jurisdiction of the Commission doing business in this state.

2. The petitioners opening this docket ("ILEC Petitioners")¹ have filed with the Commission a request to extend the date by which the ILEC Petitioners must file their requests to extend suspension of the LNP requirement and extend the date of the LNP suspensions granted to each petitioner. The reasons and authorities cited by the ILEC petitioners pertain solely to intermodal LNP. No good reason exists to grant the requested extensions as to intramodal LNP.

3. Midcontinent has a direct interest in the outcome of this proceeding. Granting by the Commission of the requests of the ILEC Petitioners will have a direct financial impact upon Midcontinent. Midcontinent is doing business in one or more of the ILEC Petitioners' territories and requires LNP to compete effectively with the ILEC Petitioners. The interim intramodal LNP ordered by the Commission in the Webster and Waubay exchanges in Docket TC04-054 has yet to be effectively implemented, notwithstanding

¹TC04-025 Kennebec; TC04-038 Santel; TC04-044 Sioux Valley; TC04-045 Golden West et al; TC04-046 Armour et al; TC04-047 Swiftel; TC04-048 Beresford Municipal; TC04-049 McCook Cooperative; TC04-050 Valley Telecom; TC04-051 Faith Municipal; TC04-052 Midstate; TC04-053 Western; TC04-054 Interstate; TC04-055 Alliance/Splitrock; TC04-056 Roberts County/RC; TC04-060 Venture; TC04-061 West River Coop.; TC04-062 Stockholm-Strandburg; and TC04-084 Tri-County.

efforts by both parties to make it work. A continuation of the status quo with respect to intramodal LNP beyond the deadline in the Commission's final order will have a significant adverse impact upon Midcontinent and its ability to do business in a competitive manner.

WHEREFORE Midcontinent prays that the Commission permit its intervention and participation in this proceeding, to examine and cross-examine witnesses and offer evidence on its own behalf.

Dated this 18th day of August, 2005.

MAY, ADAM, GERDES & THOMPSON LLP

BY: 

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CERTIFICATE OF SERVICE

David A. Gerdes of May, Adam, Gerdes & Thompson LLP hereby certifies that on the 18th day of August, 2005, he mailed by United States mail, first class postage thereon prepaid, a true and correct copy of the foregoing in the above-captioned action to the following at their last known addresses, to-wit:

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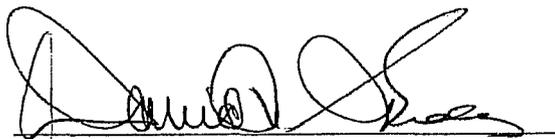
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A handwritten signature in black ink, appearing to read "David A. Gerdes", written over a horizontal line.

David A. Gerdes