



South Dakota Telecommunications Association
PO Box 57 ■ 320 East Capitol Avenue ■ Pierre, SD 57501
605/224-7629 ■ Fax 605/224-1637 ■ sdtaonline.com

Rural roots, global connections

September 16, 2005

Ms. Pamela Bonrud, Executive Director
South Dakota Public Utilities Commission
500 East Capitol Ave.
State Capitol Building
Pierre, SD 57501

RECEIVED
SEP 16 2005
SOUTH DAKOTA PUBLIC
UTILITIES COMMISSION

RE: Docket TC05-153 (In the Matter of the Review of the Implementation of 811 as a National Abbreviated Dialing Code for One Call Notification)

Dear Ms. Bonrud:

In regards to the above referenced proceeding, the South Dakota Telecommunications Association ("SDTA") submits this letter as its comments.

SDTA has surveyed its members regarding their concerns related to implementation of the 811 code for use as an abbreviated access code to the South Dakota "One-Call" system. In response, the concerns expressed related primarily to timing of the 811 implementation. A fair number of member companies have been utilizing 811 as an abbreviated access code either for use by their customers (e.g., abbreviated access for trouble reporting, or for abbreviated access to the telephone company main office) or for use in their internal operations (e.g., use by outside plant technicians for remote line identification). Pursuant to the FCC's Sixth Report and Order in CC Docket No. 92-105 (FCC 05-59) which now reserves use of the 811 dialing code for access to "One-Call" facility-locate systems, the prescribed deadline for actual conversion and operation of the 811 code for "One-Call" is sometime in the spring of 2007 (near the end of March or early April). The SDTA member companies are favorable to performing the steps needed for implementation prior to that date, but if implementation is to occur earlier, it is important to give sufficient time for the appropriate advance notice to customers. The companies would like sufficient time to change their directories and/or other company publications, to the extent that they have already included in these publications notices or advertisements concerning the use of 811 for other purposes.

With respect to technical implementation issues, it is SDTA's understanding, that the process is not overly complicated and that much of the technical work will involve making number translations in central office switch facilities. This work to our understanding would generally require the assessment of non-recurring charges by the telephone company to the entity requesting such changes (which we assume would be the State of South Dakota, as the entity operating the State One-Call system). While each telephone company situation may be different, SDTA suspects that the charges assessed would be comparable to what was in the past charged

by the telephone companies in their conversion of 511 to abbreviated access for travel and road information.

We hope these comments address some of the questions the Commission and others may have related to the 811 implementation process, from a telephone company perspective. As this process moves forward, we will be happy to investigate and present any additional information that may be helpful.

Sincerely,

A handwritten signature in black ink, appearing to read "R. D. Coit". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Richard D. Coit
Executive Director and General Counsel
SDTA

CC: SDTA Member Companies
Larry Englerth, South Dakota One-Call