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AUG 28 2006

SOUTH DAKOTA PUBLIC
UTILITIES COMMISSION

August 25th, 2006

Ms. Pam Bonrud
Executive Director
South Dakota Public Utilities Commission
Capitol Building – 1st floor
500 East Capitol Avenue
Pierre, South Dakota 57501-5070

Dear Ms. Bonrud,

Please find enclosed an original and ten copies of an Affidavit For Certification of federal USF support for Citizens Telecommunications Company of Minnesota, LLC. (“Citizens”). Citizens has been designated as an Eligible Telecommunications Carrier (“ETC”) by the Commission in the past, and asks the Commission to re-certify Citizens as an ETC for 2007 to replace the filing that was made on August 15th.

A portion of Citizens’ Jasper, Minnesota exchange extends into South Dakota, and serves 81 access lines in South Dakota. The Jasper exchange central office switch is located in Minnesota.

I recognize that companies were to submit filings of this type by August 1, 2006, and apologize for Citizens’ delay in filing. I trust the Commission will be able to include Citizens in its certification to the Universal Service Administrative Company and the Federal Communications Commission.

If there are any questions please feel free to call me at (585) 777-1146

Sincerely,

Rachel K. Thompson
Governmental and External Affairs

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SOUTH DAKOTA PUBLIC
UTILITIES COMMISSION

AFFIDAVIT

STATE OF NEW YORK)
)ss.
COUNTY OF MONROE)

1. My name is Ann Burr. I am employed by Citizens Telecommunications Company of Minnesota, LLC, (the "Company") as its VP of Government and External Affairs. I am an officer of the Company and am authorized to give this affidavit on behalf of the Company. This affidavit is provided to support the request of the Company for certification by the South Dakota Public Utilities Commission as contemplated in 47 C.F.R. § 54.314.
2. Citizens Telecommunications Company of Minnesota serves 81 customers in South Dakota from the Jasper central office. During the year 2006, the Company received federal universal service support and had investments and expense relating to the provision, maintenance and upgrading of facilities and services for which any such support would have been intended. The Company received USF in 2005 in the following amounts:

High cost loop support	\$420,723
Local switching support	\$131,068
TOTAL	\$551,791

The funding was received for all of Citizens Telecommunications of Minnesota and it is not possible to determine the South Dakota-specific portion.

3. The Company hereby also certifies that it will only use the federal high-cost support it receives during 2007 for the provision, maintenance and upgrading of facilities and services for which such support is intended. USF funding amounts for 2007 have not yet been computed by USAC. The Company has not yet finalized its capital budget for 2007. However, it is estimated that \$2,000 will be spent on outside plant in South Dakota in 2007.
4. Unlike competitive LECs and wireless carriers, who do not always have the network and facilities needed to provide service to all customers in their ETC service areas, as an ILEC, the Company already has a ubiquitous telecommunications network in place that it uses to serve its customers within the designated service area. Whenever a customer requests service, the Company will provide service within a reasonable time period provided the service does not impose excessive or unreasonable cost.
5. Citizens Telecommunications Company of Minnesota currently holds ETC status and is an ILEC offering a ubiquitous network throughout the service area. The FCC has clarified that, for the ETCs that it designates, the "service quality improvements in the five-year plan do not necessarily require additional construction of network facilities." FCC 05-46, ¶ 23. In such situations, the FCC has stated that the ETC Applicant may

provide “an explanation of why service improvements in a particular wire center are not needed and how funding will otherwise be used to further the provision of supported services in that area.” *FCC 05-46*, ¶ 23.

Because the Company has coverage throughout the service area, the company will continue to use USF support to maintain its existing network, rather than to construct additional facilities. The focus of the Company’s service quality improvement plan over the next two years will be to continue to maintain its existing facilities (such as repairing damaged cables and fibers), as well as upgrading any obsolete facilities as necessary to meet evolving service requirements and maintain high quality service. The company will replace and upgrade facilities and equipment on an “as needed” basis and for this reason, providing projected start and completion dates for projects, and specific geographic locations of such projects, is very difficult.

6. During 2005, there were no outages that lasted at least 30 minutes and affected at least ten percent of the end users in its service area or that affected a 911 special facility.
7. There were not any requests for service that were unfulfilled in 2005.
8. There were no complaints in 2005.
9. The Company complies with all applicable South Dakota and FCC consumer protection and service quality standards. Additionally, the Company has certified to the FCC that it complies with the FCC’s CPNI rules.
10. The Company is able to remain functional in an emergency situation. The Jasper exchange has a permanent stand by generator and back up batteries with a minimum of 8 hours power.
11. The Company does offer a local usage plan. The Company is the incumbent carrier.
12. The Company acknowledges that it may be required to provide equal access to long distance carriers in the event that no other ETC is providing equal access within the service area.

FURTHER AFFIANT SAYETH NOT.

ALB
Name ANN C. BURR

STATE OF NEW YORK)
)ss.
COUNTY OF MONROE)

Subscribed and sworn to before me this 25th day of August, 2006.

Cynthia A. Gayden
Notary Public

CYNTHIA A. GAYDEN
NOTARY PUBLIC, STATE OF NEW YORK
No. 01GA6103491
QUALIFIED IN MONROE COUNTY
MY COMMISSION EXPIRES DEC. 22, 2007