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November 13, 2006

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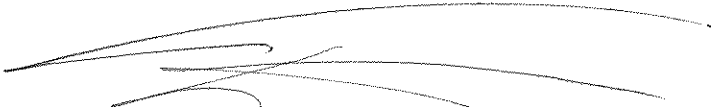
Ms. Patricia Van Gerpen  
South Dakota Public Utilities Commission  
Capitol Building, 1<sup>st</sup> Floor  
500 East Capitol Avenue  
Pierre SD 57501-5070

RE: IN THE MATTER OF THE PETITION OF VENTURE COMMUNICATIONS  
COOPERATIVE FOR SUSPENSION OR MODIFICATION OF LOCAL DIALING  
PARITY RECIPROCAL COMPENSATION OBLIGATIONS  
SDPUC Docket File Number TC 06-181  
GPGN File No. 5925.060537

Dear Ms. Van Gerpen:

Enclosed for filing please find Alltel's Petition to Intervene Suspension or Modifications of Local Dialing Parity Reciprocal Compensation Obligations in the above-entitled matter. The original will be sent via U.S. Mail today.

Sincerely,



Talbot J. Wieczorek

TJW:klw  
Enclosure

c: Darla Rogers/Margo Northrup  
Ben Dickens/Mary Sisak  
Harlan Best  
Rolayne Wiest  
Clients

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA

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IN THE MATTER OF THE PETITION OF  
VENTURE COMMUNICATIONS COOPERATIVE  
FOR SUSPENSION OR MODIFICATION OF  
LOCAL DIALING PARITY RECIPROCAL  
COMPENSATION OBLIGATIONS

**DOCKET No. TC06-181**

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**ALLTEL COMMUNICATIONS, INC.'s PETITION TO INTERVENE**

WWC License, LLC, a wholly-owned subsidiary of Alltel Communications, Inc. (hereinafter "Alltel") hereby petitions the Commission for intervention in the above-captioned proceeding pursuant to SDCL § 1-26-17.1 and A.R.S.D. §§ 20:10:01:15.02, 20:10:01:15.03 and 20:10:01:15.05. In support hereof, ALLTEL states as follows:

1. Alltel is a Commercial Mobile Radio Service ("CMRS") provider serving the state of South Dakota. Alltel operates in the state of South Dakota through its wholly-owned subsidiary, WWC License, LLC. Alltel provides cellular phone service throughout the service area of Venture Communications Cooperative.

2. On October 24, 2006, Venture Communications Cooperative (hereinafter "Venture") filed with this Commission a Petition for Suspension or Modification of Local Dialing Parity Reciprocal Compensation Obligations asking this Commission to grant an Order excusing Venture from its statutory obligations to provide dialing parity to competing providers of telephone exchange service, to transport its traffic to competing carriers, excuse the Petitioner from paying reciprocal compensation on traffic delivered to wireless carriers in the same MTA under certain circumstances and enter an Order requiring all wireless carriers to provide a forward looking cost study rather than using symmetric compensation.

3. Previously, on September 14, 2006, Venture filed a Petition for Arbitration pursuant to 47 U.S.C. § 252 of the Communications Act of 1934, as amended and pursuant to SDCL § 49-31-81 and Commission Rule 20:10:32:29. See TC 06-159. This Petition for Arbitration requested the Commission arbitrate numerous issues between Alltel and Venture regarding the interconnection agreement between the parties.

4. On October 10, 2006, Alltel filed a response to the Petition requesting certain relief from the Commission in regards to an interconnection agreement between Venture and Alltel.

5. The requested relief sought by the Petition for Suspension or Modification filed by Venture concerns numerous issues that are pending in the arbitration filed by Venture wherein

Alltel has filed a response.

6. In the negotiation phase prior to the filing of the Petition for Arbitration on the interconnection agreement, Venture never took the position that it was entitled to suspension or modification of its obligations under the Telecommunications Act. The subsequent filing of the Petition for Suspension or Modification is inappropriate in that such suspension or modification should not be granted retroactively and should not be granted where the obligations pre-existed a filing for a petition for arbitration and in the course of negotiating an interconnection agreement, the obligations were being negotiated.


7. The Petition for Suspension or Modification appears to be an attempt by Venture to manipulate the arbitration process initiated by Venture's filing for the arbitration of the terms of the interconnection agreement. Alltel is a necessary party in the Petition for Suspension or Modification as it is necessary for Alltel to be involved or to protect Alltel's rights in regards to the Petition for Arbitration of the interconnection agreement.

8. As a CMRS carrier in the Venture service area and a CMRS carrier currently seeking an interconnection agreement with Venture, the outcome of this proceeding will specifically and directly impact Alltel's pecuniary interests and it will be favorably or adversely bound and affected by this Commission's final decision on the request for suspension or modification. Alltel's ability to operate and provide services for its customers and secure future customers will be impacted by the Commission's decision in this matter.

WHEREFORE, based on the foregoing, Alltel is an interested party in this matter and should be permitted to intervene.

Dated this 12 day of November, 2006.

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 13 day of November 2006, a true and correct copy of **WWC Petition to Intervene** was sent electronically and by first-class, U.S. Mail, postage paid to:

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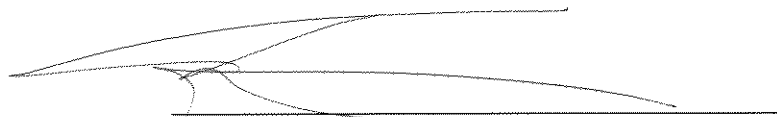
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