



South Dakota Telecommunications Association
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Rural roots, global connections

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MAY 30 2006

SOUTH DAKOTA PUBLIC
UTILITIES COMMISSION

May 30, 2006

Ms. Patty Van Gerpen, Executive Director
South Dakota Public Utilities Commission
500 East Capitol Ave.
State Capitol Building
Pierre, SD 57501

RE: Docket TC06-047 (In the Matter of the Application of Aventure
Communication Technology, LLC for a Certificate of Authority to Provide Local
Exchange Services in South Dakota)

Dear Ms. Van Gerpen:

Attached for filing with the Commission in the above referenced docket are the original and ten (10) copies of a Petition to Intervene of the South Dakota Telecommunications Association.

You will also find attached to the Petition a certificate of service verifying service of this document, by mail, on Sharon Thomas and Douglas Furlich, representatives of Aventure Communication Technology.

Thank you for your assistance in filing and distributing these documents.

Sincerely,

Richard D. Coit
Executive Director and General Counsel
SDTA

RDC/ms

MAY 30 2006

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA**

IN THE MATTER OF THE APPLICATION OF)	
AVENTURE COMMUNICATION)	
TECHNOLOGY, L.L.C. FOR A CERTIFICATE)	DOCKET TC06-047
OF AUTHORITY TO PROVIDE LOCAL)	PETITION TO INTERVENE
EXCHANGE SERVICES IN SOUTH DAKOTA)	
)	

SDTA Petition for Intervention

The South Dakota Telecommunications Association ("SDTA") hereby petitions the Commission for intervention in the above captioned proceeding pursuant to SDCL 1-26-17.1 and ARSD §§ 20:10:01:15.02, 20:10:01:15.03 and 20:10:01:15.05. In support hereof, SDTA states as follows:

1. Aventure Communication Technology, L.L.C. ("Aventure") has filed with the Commission an application for a certificate of authority pursuant to this Commission's administrative rules seeking authorization to provide local exchange services in certain exchange areas within South Dakota. Paragraph 8 of its application indicates, specifically, that its request for local service authority extends to exchange areas served by the following South Dakota incumbent local exchange carriers: Qwest Corporation; Jefferson Telephone Company d/b/a Long Lines; Vivian Telephone Company d/b/a Golden West Telecommunications; Prairie Wave Community Telephone, Inc.; and Alliance Communications Cooperative, Inc..

2. SDTA is an incorporated organization representing the interests of numerous cooperative, independent and municipal telephone companies operating throughout the State of South Dakota as "rural telephone companies" as defined in 47 U.S.C. § 153(37). Its current membership includes each of the rural telephone companies identified in the previous paragraph.

3. If Aventure is actually seeking a certificate of authority for local exchange services extending to rural telephone company exchanges, the provisions of SDCL § 49-31-70 and ARSD § 20:10:32:04 are applicable and require that notice of the application be provided to other, already certified, local exchange carriers ("LECs"). No indication is given by the application as to whether Aventure has provided this required notice to affected incumbent LECs.

6. All of the SDTA member companies operate as “rural telephone companies” for purposes of the Federal Telecommunications Act of 1996 and also the state laws enacted in 1998 addressing local exchange competition (SDCL §§ 39-31-69, et. seq.).

7. SDTA seeks intervention in this proceeding based on the individual interests of each of its member LECs listed above and based on the common interest of its remaining rural telephone company members. It appears that action on the pending application of Aventure will require this Commission to consider and apply the provisions of SDCL § 49-31-73 and ARSD §§ 20:10:32:15 thru 20:10:32:17 which are intended to impose additional service obligations on competitive local service providers seeking certification in rural service areas. All of the member companies of SDTA have an interest in ensuring that these rural safeguard provisions contained in the state statutes and within the Commission’s administrative rules are properly applied in this pending application process.

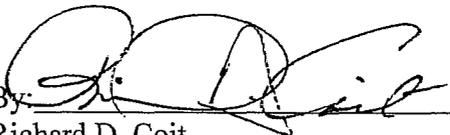
8. In addition, SDTA and its members believe this Commission should insist on compliance with its other administrative rules applicable to the local service certification and, at this time, the Aventure filing is deficient for failing to provide all of the information required by the Commission’s administrative rules.

9. Based on the foregoing, SDTA alleges that it is an interested party in this matter and would seek intervening party status.

Dated May 30, 2006.

Respectfully submitted:

THE SOUTH DAKOTA
TELECOMMUNICATIONS ASSOCIATION

By: 

Richard D. Coit
Executive Director and General Counsel

CERTIFICATE OF SERVICE

I hereby certify that an original and ten (10) copies of the enclosed Petition to Intervene in Docket TC06-047 were hand-delivered to the South Dakota PUC on May 30, 2006, directed to the attention of:

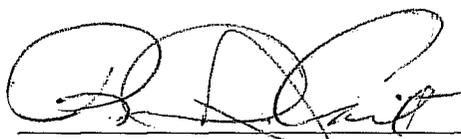
Patty Van Gerpen
Executive Director
South Dakota Public Utilities Commission
500 East Capitol Avenue
Pierre, SD 57501

A copy was sent by US Postal Service First Class mail to the following individuals:

Sharon Thomas
Consultant
Technologies Management Inc.
P.O. Drawer 200
Winter Park, Florida 32790-0200

Doug Furlich
General Manager
Aventure Communications
401 Douglas Street, Suite 406
Sioux City, Iowa 51101

Dated this 30th day of May, 2006.



Richard D. Coit, General Counsel
South Dakota Telecommunications Association
PO Box 57 – 320 East Capitol Avenue
Pierre, SD 57501-0057