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MAY 18 2006

**SOUTH DAKOTA PUBLIC  
UTILITIES COMMISSION**

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MARGO D. NORTHRUP, Associate

May 18, 2006

Hand delivered

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

Re: INTERSTATE TELECOMMUNICATIONS COOPERATIVES APPLICATION FOR EXTENSION OF DEADLINE FOR FILING OF 2006 COST STUDY

Dear Patty:

Enclosed herein are original and ten (10) copies of the Petition for filing in the above reference docket.

Sincerely yours,



Darla Pollman Rogers  
Attorney at Law

DPR/ea

Enclosures

cc: Client

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MAY 18 2006

BEFORE THE PUBLIC UTILITIES COMMISSION

OF THE STATE OF SOUTH DAKOTA

SOUTH DAKOTA PUBLIC  
UTILITIES COMMISSION

INTERSTATE TELECOMMUNICA-  
TIONS COOPERATIVES APPLICATION  
FOR EXTENSION OF DEADLINE FOR  
FILING OF 2006 COST STUDY

Docket No. \_\_\_\_\_

PETITION

Interstate Telecommunications Cooperative ("ITC") by and through its Attorney, Darla Pollman Rogers of Riter, Rogers, Wattier & Brown, LLP, respectfully requests that the South Dakota Public Utilities Commission ("Commission") grant it an extension of the deadline for filing its 2006 cost study, as follows:

1. ARSD § 20:10:27:07 requires a carrier's carrier to file cost data in support of its switched access service tariff no less than once every three years.
2. ARSD § 20:10:27:14 requires carriers to file a cost study within six (6) months of the close of the test year upon which the carrier is relying to support a change in switched access rates. The rule also gives authority to the Commission to grant an extension of the six (6) month filing period, upon request of the carrier.
3. ITC filed a cost study on or about June 30, 2003 (Docket TC03-105). Pursuant to ARSD § 20:10:27:07 and ARSD § 20:10:27:14, ITC is required to file a cost study no later than June 30, 2006.
4. ITC requests an extension of the six (6) month filing period, for the following reasons:


a. ITC anticipates there will be a change in the intrastate switched access rules in the near future, either through new intercarrier compensation rules adopted by the FCC, or pursuant to the rule-making docket currently pending before this Commission. ITC requests an extension of the six (6) month filing deadline for submitting its 2006 cost study until such time as there is a clear indication of what will be required of carriers under the new switched access regime.

b. ITC is a member of the Local Exchange Carriers Association ("LECA"). LECA is currently negotiating with Commission Staff and Intervenors in the 2005 cost study dockets for settlement of the 2005 cost study dockets, pending the events in subparagraph (a) above. Said settlement may include an agreement by individual carriers such as ITC to not file a cost study in 2006. ITC requests this extension to allow the settlement negotiations to continue and in order to study the effects of a settlement, if one is reached, upon ITC.

c. ITC will retain its current access rates, pending the outcome of the events in subparagraph (a) & (b) above, or until ITC files a 2006 cost study, pursuant to the granting of its request herein to extend the filing deadline.

WHEREFORE, ITC respectfully requests the Commission to grant ITC an extension of the six (6) month filing deadline for filing its 2006 cost study.

Dated this 18<sup>th</sup> day of May, 2006.

  
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