LARSON & NIPE

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Respond to this office

Ms. Patty Van Gerpen

June 21, 2006

Jun 26 mil

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION Jeffrey D. Larson PO Box 277 Woonsocket, SD 57385 (605)796-4245

Executive Director South Dakota Public Utilities Commission 500 East Capitol Avenue Pierre, South Dakota 57501

Re: SANTEL COMMUNICATIONS COOPERATIVE, INC. APPLICATION FOR EXTENSION OF DEADLINE FOR FILING OF 2006 COST STUDY

Dear Patty:

Enclosed herein are an original and ten (10) copies of the Petition for filing in the above referenced docket. If you have any questions please contact Jeff Larson or me.

Sincerely yours,

Chris Nipe

Attorney at Law

CAN/ts

Enclosures

CC:

Santel - Gene Kroell

Vantage Point Solutions-Doug Eidahl

TC06-068

BEFORE THE PUBLIC UTILITIES COMMISSION

RECEIVED JUN 2 6 2006 SOUTH DAKOTA PUBLIC

OF THE STATE OF SOUTH DAKOTA

SANTEL COMMUNICATIONS COOPERATIVE, INC. PETITION FOR EXTENSION OF DEADLINE FOR FILING OF 2006 COST STUDY

Docket	No.	

PETITION

Santel Communications Cooperative, Inc. ("Santel") by and through its Attorney, Jeff Larson of Larson and Nipe, 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. Santel filed its last cost study with the Commission on or about June 30, 2005 (Docket TC05-097). Pursuant to ARSD § 20:10:27:07 and ARSD § 20:10:27:14, Santel is not required to file a 2006 cost study, however, a company may find it necessary to file a study each year based on investments or other factors.
- 4. Santel requests an extension of the six (6) month filing period, for the following reasons:

- a. Santel 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 a settlement of the 2005 cost study dockets, which includes Santel's last cost study. Any settlement may include an agreement by individual carriers such as Santel to not file a cost study in 2006. However, these discussions have been going on for some time and a settlement may not occur. Further, Santel has made major investments in its network and may desire to file a cost study if a settlement is not reached. Therefore, Santel 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 Santel. If settlement is not timely reached, Santel wishes to preserve its right to file a cost study consistent with the Commission's rules.
- b. Santel 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. Santel 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.
- c. Santel will retain its current access rates, pending the outcome of the events in subparagraph (a) & (b) above, or until Santel files a 2006 cost study, pursuant to the granting of its request herein to extend the filing deadline.

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

Dated this 20th day of June, 2006.

Chris Nipe

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