LAW OFFICES

RITER, ROGERS, WATTIER & BROWN, LLP

TC06-072

Professional & Executive Building 319 South Coteau Street P.O. Box 280 Pierre, South Dakota 57501-0280

www.riterlaw.com

ROBERT C. RITER, Jr. DARLA POLLMAN ROGERS JERRY L. WATTIER JOHN L. BROWN

MARGO D. NORTHRUP, Associate

TELEPHONE 605-224-5825 FAX 605-224-7102

Robert D. Hofer E. D. Mayer

OF COUNSEL:

JUN 2 8 2006

June 28, 2006

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

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

Re:

Beresford Municipal Telephone, Midstate Communications, Western Telephone company and Roberts County's Applications for Extension of Deadline for Filing of 2006 Cost Studies

Dear Patty:

Please find enclosed herein for filing the original and ten (10) copies of Applications for Extension of Deadline for Filing of 2006 Cost Studies for the above named companies.

Sincerely yours,

Margo D. Northrup Attorney at Law

MND/ea

Enclosures

cc:

Todd Hansen

Pamela Harrington Carmen Brown Tim Eklund Marlene Bennett

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## BEFORE THE PUBLIC UTILITIES COMMISSION

## OF THE STATE OF SOUTH DAKOTA

BERESFORD MUNICIPAL TELE-	Docket No.
PHONE COMPANY APPLICATION FOR EXTENSION OF DEADLINE FOR FILING OF 2006 COST STUDY	PETITION

Beresford Municipal Telephone Company ("Beresford") by and through its Attorney, Darla Pollman Rogers and Margo D. Northrup of Riter, Rogers, Wattier & Brown, LLP, respectfully requests that the South Dakota Public Utilities Commission ("Commission") allow Beresford to file a 2006 cost study after June 30, 2006, using calendar year 2005 as its historical test year. This Petition is based on the following grounds:

- 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, but the switched access rules do not prohibit a carrier from filing cost data in support of its switched access service tariff more frequently 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. Beresford filed a cost study on or about June 29, 2005 (Docket TC05-092). Beresford wishes to preserve its option to file a 2006 cost study after the filing

deadline of June 30, 2006, but still use calendar year 2005 as the test year to support Beresford's 2006 cost study.

- 4. Beresford is requesting an extension of the six (6) month filing period, for the following reasons:
  - a. Beresford 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. Beresford requests an extension of the six (6) month filing deadline for submitting its 2006 cost study until such time as there is a clearer indication of what will be required of carriers under the new switched access regime.
  - b. Beresford's 2005 cost study has not yet been resolved and is currently scheduled for hearing in September, 2006. Beresford's decision on whether to file a cost study in 2006 may be affected by the outcome of the pending 2005 docket.
  - c. Beresford will retain its current access rates, pending the outcome of the events in subparagraphs (a) & (b) above, or until Beresford files a 2006 cost study, pursuant to the granting of its request herein to extend the filing deadline.
- 5. Beresford is requesting an extension to December 31, 2006, to file a 2006 cost study, using calendar year 2005 as the test year to support Beresford's 2006 cost study.

WHEREFORE, Beresford respectfully requests the Commission to grant Beresford an extension of the six (6) month filing deadline for filing its 2006 cost study, to December 31, 2006, using calendar year 2005 as Beresford's test year.

Dated this 28<sup>th</sup> day of June, 2006.

Margo D. Northrup

Darla Pollman Rogers

Riter, Rogers, Wattier & Brown, LLP

P. O. Box 280

Pierre, South Dakota 57501

Telephone (605) 224-7889

Fax (605) 224-7102