

## Boyce, Greenfield, Pashby & Welk, LLP

tjwelk@bgpw.com

Direct Dial: 605-731-0208

Attorneys at Law

101 N. Phillips Ave., Suite 600

Sioux Falls, SD 57104

P.O. Box 5015

Sioux Falls, SD 57117-5015

P: 605-336-2424

F: 605-334-0618

www.bgpw.com

Russell R. Greenfield

Gary J. Pashby

Thomas J. Welk

Michael S. McKnight

Gregg S. Greenfield

Roger A. Sudbeck

Lisa K. Marso

Heather R. Springer\*

Michael F. Tobin

Christopher W. Madsen

Sherri L. Rotert\*\*

Charles A. Larson

Jennifer E. Bunkers+

Jason R. Sutton

Paul W. Tschetter

\*Also licensed in Kansas

\*\*Also licensed in Colorado

+Also licensed in Minnesota

January 16, 2008

Ms. Karen E. Cremer

Staff Attorney

South Dakota Public Utilities Corporation

500 East Capitol

Pierre, SD 57501

Mr. Doug Eidahl
Vice President of Consulting
Vantage Point
1801 North Main Street
Mitchell, SD 57301

Ms. Patricia Van Gerpen Executive Director

South Dakota Public Utilities Corporation

500 East Capitol

Pierre, SD 57501

Mr. Keith Senger

Staff Analyst

South Dakota Public Utilities Corporation

500 East Capitol

Pierre, SD 57501

Re:

Sancom, Inc. v. Qwest Corporation

Civ. 07-4147

Our File No.: 2104.139

To the above-named recipients:

Enclosed please find a copy of *Qwest Communications Corporation's Petition for Leave to Intervene*. This is intended as service upon you.

Sincerely,

BOYCE, GREENFIELD, PASHBY & WELK, L.L.P.

Monas J. Welte

Thomas J. Welk

TJW/cab

C: George Baker Thomson, Jr. (w/enclosure)

Larry Toll (w/enclosure)

J.W. Boyce (1884-1915)

## PUBLIC UTILITIES COMMISSION OF THE STATE OF SOUTH DAKOTA

IN THE MATTER OF THE APPLICATION OF SANCOM, INC. FOR EXTENSION OF TIME OF EXEMPTION FROM DEVELOPING COMPANY SPECIFIC COSTBASED SWITCHED ACCESS RATES

TC07-128

QWEST COMMUNICATIONS CORPORATION'S PETITION FOR LEAVE TO INTERVENE

Qwest Communications Corporation ("QCC") by and through its undersigned counsel, and pursuant to SDCL 1-26-17.1 and ARSD 20:10:01:15.02, hereby files its Petition for Leave to Intervene in this docket. In support of its Petition for Leave to Intervene, QCC states as follows:

- 1. QCC is a Delaware corporation duly authorized to do business in South Dakota, with its general offices in Denver, Colorado. It is a telecommunications company as defined by SDCL §49-31-1(35) authorized by the Commission to provide telecommunications services within its certified service territory in South Dakota.
- 2. QCC has in the past purchased, and will purchase switched access services from Sancom in an amount which is substantial, and therefore has a direct and immediate pecuniary interest in the Commission's decision in this docket.
- 3. QCC's position in this docket is to ensure that Sancom's switched access rates are determined in accordance with the facts and applicable law, and to examine whether Sancom's requested extension of waiver is just, reasonable, and in the public interest.
  - 4. QCC will be represented in this proceeding by the counsel listed below.

WHEREFORE, QCC respectfully requests that its Petition for Leave to Intervene be granted.

DATED this 16th day of January, 2008

Thomas J. Welk

Christopher W. Madsen

Boyce, Greenfield, Pashby & Welk, L.L.P.

Jew

101 N. Phillips Ave., Suite 600

Sioux Falls, SD 57117-5015

Telephone: (605) 336-2424

Attorneys for Owest Communications Corporation

## CERTIFICATE OF SERVICE

I, Thomas J. Welk, do hereby certify that I am a member of the law firm of Boyce, Greenfield, Pashby & Welk, L.L.P. and on the 16<sup>th</sup> day of January, 2008, a true and correct copy of Qwest Communications Corporation's Petition for Leave to Intervene was sent to the following by U S first class mail, postage prepaid, at the following address:

Ms. Patricia Van Gerpen Executive Director South Dakota Public Utilities Corporation 500 East Capitol Pierre, SD 57501

Mr. Keith Senger Staff Analyst South Dakota Public Utilities Corporation 500 East Capitol Pierre, SD 57501 Ms. Karen E. Cremer Staff Attorney South Dakota Public Utilities Corporation 500 East Capitol Pierre, SD 57501

Mr. Doug Eidahl Vice President of Consulting Vantage Point 1801 North Main Street Mitchell, SD 57301

Thomas J. Welk