



Robert C. Riter, Jr.  
Darla Pollman Rogers  
Jerry L. Wattier  
Margo D. Northrup

Associate:  
Lindsey Riter-Rapp

Of Counsel:  
Robert D. Hofer

July 30, 2008

Ms. Patricia Van Gerpen  
SD Public Utilities Commission  
500 E Capitol Ave  
Pierre SD 57501

Re: In the Matter of the Petitions of LECs for Suspension or Modification of 47 U.S.C.  
Section 251 (b)(2) of the Communications Act of 1934 as Amended  
(Docket No. TC08-006 through TC08-027)

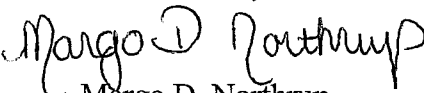
Dear Ms. Van Gerpen:

Enclosed herein, please find the Request for Further Temporary Suspension and Certificate of Service regarding the above referenced matter.

Sincerely yours,

RITER, ROGERS, WATTIER &  
NORTHTRUP, LLP

By:

  
Margo D. Northrup

DPR/lma  
Enclosure

Law Office  
Riter, Rogers, Wattier, & Northrup, LLP  
Phone: 605-224-5825 • Fax: 605-224-7102 • www.riterlaw.com  
319 South Coteau Street • P.O. Box 280 • Pierre, South Dakota 57501-0280



In the Matter of the Petition of Golden West Telecommunications Cooperative, Inc., for Suspension or Modification of 47 U.S.C. Section 251 (b)(2) of the Communications Act of 1934 as Amended	) ) ) ) ) ) )	Docket No. TC08-014
In the Matter of the Petition of Vivian Telephone Company for Suspension or Modification of 47 U.S.C. Section 251 (b)(2) of the Communications Act of 1934 as Amended	) ) ) ) ) ) )	Docket No. TC08-015
In the Matter of the Petition of Kadoka Telephone Company for Suspension or Modification of 47 U.S.C. Section 251 (b)(2) of the Communications Act of 1934 as Amended	) ) ) ) ) ) )	Docket No. TC08-016
In the Matter of the Petition of Brookings Municipal Utilities d/b/a Swiftel Communications for Suspension or Modification of 47 U.S.C. Section 251 (b)(2) of the Communications Act of 1934 as Amended	) ) ) ) ) ) )	Docket No. TC08-017
In the Matter of the Petition of Union Telephone Company for Suspension or Modification of 47 U.S.C. Section 251 (b)(2) of the Communications Act of 1934 as Amended	) ) ) ) ) ) )	Docket No. TC08-018
In the Matter of the Petition of Armour Independent Telephone Company for Suspension or Modification of 47 U.S.C. Section 251 (b)(2) of the Communications Act of 1934 as Amended	) ) ) ) ) ) )	Docket No. TC08-019
In the Matter of the Petition of McCook Cooperative Telephone Company for Suspension or Modification of 47 U.S.C. Section 251 (b)(2) of the Communications Act of 1934 as Amended	) ) ) ) ) ) )	Docket No. TC08-020
In the Matter of the Petition of Bridgewater-Canistota Independent Telephone Company for Suspension or Modification of 47 U.S.C. Section 251 (b)(2) of the Communications Act of 1934 as Amended	) ) ) ) ) ) )	Docket No. TC08-021
In the Matter of the Petition of Valley Telecommunications Cooperative Association, for Suspension or Modification of 47 U.S.C. Section 251 (b)(2) of the Communications Act of 1934 as Amended	) ) ) ) ) ) )	Docket No. TC08-022

In the Matter of the Petition of Midstate Communications, Inc., for Suspension or Modification of 47 U.S.C. Section 251 (b)(2) of the Communications Act of 1934 as Amended	)	Docket No. TC08-023
	)	
In the Matter of the Petition of Interstate Telecommunications Cooperative, Inc., and Hills Telephone Company, Inc. for Suspension or Modification of 47 U.S.C. Section 251 (b)(2) of the Communications Act of 1934 as Amended	)	Docket No. TC08-024
	)	
In the Matter of the Petition of West River Cooperative Telephone Company for Suspension or Modification of 47 U.S.C. Section 251 (b)(2) of the Communications Act of 1934 as Amended	)	Docket No. TC08-025
	)	
In the Matter of the Petition of Stockholm Strandburg Telephone Company for Suspension or Modification of 47 U.S.C. Section 251 (b)(2) of the Communications Act of 1934 as Amended	)	Docket No. TC08-026
	)	
In the Matter of the Petition of Santel Communications Cooperative, Inc. for Suspension or Modification of 47 U.S.C. Section 251 (b)(2) of the Communications Act of 1934 as Amended	)	Docket No. TC08-027
	)	

**REQUEST FOR FURTHER TEMPORARY SUSPENSION**

Come now the above named Petitioners, by and through their undersigned counsel, and hereby request the Commission for a further temporary suspension to implement LNP. This request is based on the following grounds:

1. On or about April 22, 2008, the parties in this docket entered into a Stipulation for Procedural Schedule. In said Stipulation, the parties agree that the Petitioner’s existing suspension be extended to August 8, 2008. The parties further agreed that “the LECs may seek a further temporary suspension as necessary, until November 8, 2008.”

2. The LECs are engaged in settlement negotiations with the Wireless Carriers, but the dockets have not yet been settled.

3. Discovery and pre-filed testimony is being exchanged among the parties, pursuant to the procedural schedule, as modified.

4. Hearing on the dockets is scheduled for September 4 and 5 and the decision date for the Commission is November 8, 2008.

5. Because the dockets have not been settled, and a decision date is set, Petitioners request a further temporary suspension, until November 8, 2008. If ordered to implement LNP by the Commission, Petitioners ask for an additional 90 days after the Order requiring implementation to implement LNP.

Wherefore, Petitioners respectfully move the Commission for a further temporary suspension, to November 8, 2008 or until 90 days after November 8, 2008, if ordered to implement LNP.

Dated this 30<sup>th</sup> day of July, 2008.

Riter, Rogers, Wattier & Northrup, LLP

By: Darla Pollman Rogers  
Darla Pollman Rogers  
Margo D. Northrup  
319 S. Coteau Street  
P. O. Box 280  
Pierre, SD 57501  
Attorneys for LECs

By: /s/ Richard J. Helsper  
(for Brookings Municipal Utilities  
d/b/a Swiftel Communications)

## Certificate of Service

The undersigned, attorney for Petitioners, hereby certifies that a true and correct copy of the foregoing Stipulation for Procedural Schedule was served electronically on this 30 day of July, 2008, upon:

Ms. Rolayne Ailts Weist  
Public Utilities Commission  
State of South Dakota  
500 East Capitol Avenue  
Pierre SD 57501  
E-mail: [rolayne.weist@state.sd.us](mailto:rolayne.weist@state.sd.us)

Mr. Harlan Best, Staff Analyst  
Public Utilities Commission  
State of South Dakota  
500 East Capitol Avenue  
Pierre SD 57501  
E-mail: [Harlan.best@state.sd.us](mailto:Harlan.best@state.sd.us)

Ms. Patricia Van Gerpen  
Executive Director  
South Dakota Public Utilities Commission  
500 E Capitol Avenue  
Pierre SD 57501  
[Patty.vangerpen@state.sd.us](mailto:Patty.vangerpen@state.sd.us)

Mr. Stephen Rowell  
Alltel Communications Inc  
One Allied Drive  
Little Rock AR 72202  
[Stephen.b.rowell@alltel.com](mailto:Stephen.b.rowell@alltel.com)

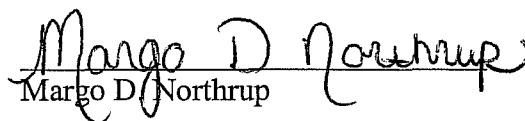
Mr. Phillip Schenkenberg  
Attorney at Law  
Briggs and Morgan P.A.  
80 South Eight Street  
2200 IDS Center  
Minneapolis MN 55402  
[Pschenkenberg@briggs.com](mailto:Pschenkenberg@briggs.com)

Mr. Talbot Wieczorek  
Attorney at Law  
Gunderson Palmer Goodsell & Nelson  
PO Box 8045  
Rapid City SD 57709-8045  
[tjw@gpgnlaw.com](mailto:tjw@gpgnlaw.com)

Mr. Richard Coit  
Executive Director/General Counsel  
SDTA  
PO Box 57  
Pierre SD 57501-0057  
[richcoit@sdtaonline.com](mailto:richcoit@sdtaonline.com)

Mr. Dennis Duncan  
Attorney at Law  
Zimmer Duncan and Cole  
PO Box 550  
Parker SD 57053  
[diduncan@zdcclaw.com](mailto:diduncan@zdcclaw.com)

Ms. Mary J. Sisak  
Attorney at Law  
Blooston, Mordkofsky, Dickens, Duffy &  
Prendergast, LLP  
2120 L Street N.W., Suite 300  
Washington DC 20037  
[mjs@bloostonlaw.com](mailto:mjs@bloostonlaw.com)

  
Margo D Northrup