MAY, ADAM, GERDES & THOMPSON LLP

503 SOUTH PIERRE STREET P.O. BOX 160

PIERRE, SOUTH DAKOTA 57501-0160

DAVID A. GERDES
CHARLES M. THOMPSON
ROBERT B. ANDERSON
TIMOTHY M. ENGEL
MICHAEL F. SHAW
BRETT KOENECKE
CHRISTINA L. FISCHER

since 1881 www.magt.com February 29, 2008 OF COUNSEL THOMAS C. ADAM RETIRED WARREN W. MAY

GLENN W. MARTENS (881-1963 KARL GOLDSMITH (885-1966 BRENT A. WILBUR (949-2006

> TELEPHONE 605 224-8803 TELECOPIER

TELECOPIER 605 224 6289 E-MAIL dag@magt.com

E-FILED

PATRICK M. GRODE

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

RE: PETITION FOR SUSPENSION OR MODIFICATION OF LOCAL LOCAL NUMBER PORTABILITY

Docket No. TC08-021 Our file: 0053

Dear Patty:

Enclosed for filing is a Petition to Intervene in this docket. Please file the enclosure.

With a copy of this letter, service by electronic means is made upon the service list. Thank you very much.

Yours truly,

MAY, ADAM, GERDES & THOMPSON LLP

DAG: mw

Enclosure

cc/enc: Service List

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF SOUTH DAKOTA

IN THE MATTER OF THE PETITION OF)	TC08-021
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.)	

PETITION TO INTERVENE

Pursuant to ARSD 20:10:01:15.02 Midcontinent Communications ("Midcontinent") by its undersigned counsel petitions the Commission to intervene, as follows:

- 1. Midcontinent is a certificated telecommunications carrier under the jurisdiction of the Commission, providing competitive local exchange service and long distance service throughout the state in both rural and non-rural local exchanges.
- 2. The petition requests suspension of Petitioner's obligation under the Telecommunications Act of 1996 to provide local number portability as provided in Section 251(b)(2) to competitive carriers in its service area. As a local exchange carrier in both US West and rural exchanges in the state, Midcontinent has a business interest in preserving and maintaining local number portability. A review of this petition, together with other comparable petitions filed by incumbent local exchange carriers, causes Midcontinent to believe that the relief requested in the petitions if fashioned too broadly would adversely affect the manner in which Midcontinent does business in this state.
- 3. Midcontinent has a direct interest in the outcome of this proceeding. As a local exchange carrier any action by the Commission dealing with local number portability, if too broadly fashioned, will potentially have a direct financial impact upon Midcontinent and its ability to do business in this state.

WHEREFORE Midcontinent prays that the Commission permits its intervention and participation in this proceeding to examine and cross-examine witnesses and offer evidence on its own behalf.

Dated this 29th day of February, 2008.

MAY, ADAM, GERDES & THOMPSON LLP

DAVID A. GERDES

Attorneys for Midcontinent 503 South Pierre Street

P.O. Box 160

Pierre, South Dakota 57501-0160

Telephone: (605)224-8803 Telefax: (605)224-6289 E-mail: dag@magt.com

CERTIFICATE OF SERVICE

David A. Gerdes of May, Adam, Gerdes & Thompson LLP hereby certifies that on the 29th day of February, 2008, he filed electronically a true and correct copy of the foregoing Petition to Intervene in the above-captioned action to the following at their last known addresses, to-wit:

MS PATRICIA VAN GERPEN
EXECUTIVE DIRECTOR
SOUTH DAKOTA PUBLIC UTILITIES COMMISSION
patty.vangerpen@state.sd.us

MS ROLAYNE AILTS WIEST
STAFF ATTORNEY
SOUTH DAKOTA PUBLIC UTILITIES COMMISSION
rolayne.wiest@state.sd.us

MR HARLAN BEST
STAFF ANALYST
SOUTH DAKOTA PUBLIC UTILITIES COMMISSION
harlan.best@state.sd.us

MS DARLA POLLMAN ROGERS
RITER, ROGERS, WATTIER & BROWN, LLP
dprogers@riterlaw.com

MS MARGO D. NORTHRUP
RITER, ROGERS, WATTIER & BROWN, LLP
m.northrup@riterlaw.com

MR DENNIS LAW
REGIONAL MANAGER
SIOUX VALLEY TELEPHONE COMPANY
dlaw@siouxvalley.net

MS LINDA GODFREY
VERIZON WIRELESS
Linda.godfrey@verizonwireless.com

David A. Gerdes