



Phone Internet Cable

May 30, 2008

Ms. Patricia Van Gerpen
Executive Director
South Dakota Public Utilities Commission
Capitol Building, 1st Floor
500 East Capitol Avenue
Pierre, SD 57501

**RE: Request for Certification Regarding Use of Federal Universal Service
Support For Knology of the Black Hills, LLC**

Dear Ms. Van Gerpen:

On behalf of Knology of the Black Hills, LLC enclosed for electronic filing is the Request for Certification Regarding Its Use of Federal Universal Service Support submitted for Commission approval.

Exhibits A, B and C are confidential documents.

Sincerely,

Kristie Lyngstad
Paralegal

Enclosures

**BEFORE THE
SOUTH DAKOTA PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF THE REQUEST OF)	
KNOLOGY OF THE BLACK HILLS, LLC)	ANNUAL ETC CERTIFICATION
FOR CERTIFICATION REGARDING ITS)	FILING AND SUBMITTAL
USE OF FEDERAL UNIVERSAL)	PURSUANT TO ARSD § 20:10:32:53
SERVICE SUPPORT.)	

Knology of the Black Hills, LLC. (the "Company"), by and through its attorney, makes this filing requesting certification from the South Dakota Public Utilities Commission (the "Commission") as is required under 47 C.F.R. § 54.314 and to comply with the Commission's new rules pertaining to ETCs, including the provisions of ARSD §§ 20:10:32:52, 20:10:32:53 and 20:10:32:54. As part of this filing, the Company offers the following:

1. Pursuant to 47 C.F.R. § 54.314, each carrier that has been designated as an eligible telecommunications carrier ("ETC") that is eligible to receive future federal universal service support must file an annual certification with the FCC and the Universal Service Administrative Company ("USAC") stating that federal high-cost support provided to the carrier will be used only for the provision, maintenance and upgrading of facilities and services for which the support is intended. This certification requirement applies to various categories of federal universal service support, including support provided pursuant to 47 C.F.R. §§ 54.301, 54.305, and/or 54.307, and/or 47 C.F.R. Part 36, Subpart F (high-cost loop support, local switching support, safety net additive support and safety valve support). Support provided under these FCC rule provisions will only in the future be made available if the State Commission files the requisite certification pursuant to 47 C.F.R. § 54.314.

2. The certification required specifically for rural carriers to receive federal universal service support for all four quarters during calendar year 2009 is currently due to be filed with the FCC and USAC on or before October 1, 2008. The certification may be presented to these entities in the form of a letter from the State Commission. The letter must identify which carriers in the State are eligible to receive federal support during the 12-month period and must certify that the carriers listed will only use the support for the provision, maintenance and upgrading of facilities and services for which the support is intended.

3. The Company is a competitive local exchange telephone company that has previously been designated by this Commission as a Competitive ETC. The Company provides

local exchange telephone services, including all of the essential services that are included in the federal definition of universal service, to approximately 12,070 access lines within its established service area in South Dakota.

4. As is required by the provisions of ARSD § 20:10:32:43.01, the Company is committed to providing service throughout its existing rural service area, or study area, to all customers making a reasonable request for service. The Company has since September 30, 2004 served as competitive eligible telecommunications carrier within its established service area and has operated as a "carrier of last resort" in such area. As the carrier of last resort, the Company already has extended wireline local exchange network facilities throughout its service area as necessary to make all essential local exchange services that are supported by federal universal service available to all end-user customers within its service area. Consistent with its past practice, the Company hereby certifies that it will provide service on a timely basis to all requesting customers within its designated ETC service area. In certain cases, the provisioning of this service may require a customer in a new location to first meet the requirements of the Company's line extension policies. These line extension policies are, however, consistent with the requirement under both federal and state law to meet all reasonable requests for service.

5. Under ARSD 20:10:32:43:04, 20:10:33:31, 20:10:34:09 and 20:10:34:10 the Company protects consumers by complying with all federal and state consumer protection laws and regulations and those consumer protections enumerated in ARSD 20:10:34. A subscriber's bill contains a clear, concise description of all services billed, Knology's name and a toll free number where the subscriber can call with billing questions. The Company changes rates, terms or conditions of service only after notifying customers of any such change in writing on the bill, a bill insert or a separate letter to each customer.

Under ARSD 20:10:33, the Company provides service using modern digital switching and fiber optic, coaxial, and copper facilities to provide modern voice and data services. The network has emergency back-up power as prescribed by commission rule and is monitored 24 hour a day, 7 days a week, 365 days a year to ensure timely response to any system degradation or service outage. The Company fully complies with all requirements for access to emergency service to include 911 and E911. The Company is also fully compliant with all requirements for access to its network by law enforcement and homeland security agencies and with the requirements of CALEA. The network is configured as a SONET ring so that any system failure

can be rerouted diversely to minimize the impact of any facility problem or outage. In a number of cases the system contains redundant cable facilities and redundant environmental and fire suppression capabilities to further ensure service availability at all times.

6. Under ARSD 20:10:32:54(7), Knology of the Black Hills, LLC certifies that it is offering a local usage plan comparable to that offered by the incumbent LEC in the ETC exchanges. The Company provides a local usage plan that is not only equal to but better than what the incumbent LEC offers.

7. Under ARSD 20:10:32:43.05, Knology of the Black Hills, LLC offers a local usage plan that is superior to that of the LEC since the Company's customers have an expanded local calling area including the EAS areas served by the incumbent and the entire local calling area of the Company which includes Rapid City and all of the Northern Hills. The Company also offers more features than the incumbent LEC at a very competitive price.

8. The Company has the ability to remain functional in emergency situations as required by the provisions of ARSD § 20:10:32:43.03. The Company is currently in compliance with this Commission's "auxiliary and battery power requirements" set forth in ARSD 20:10:33:19.

9. The provisions of ARSD § 20:10:32:54 addressing the annual "Certification requirements" set forth by this Commission indicate in part that the Competitive ETC must show "how much universal service support was received." Accordingly, attached hereto as "Exhibit A" is information indicating "Year 2007 Federal Universal Service Receipts" itemized by support category, received by the Company and Estimated Year 2009 Federal Universal Service Receipts itemized by support category. This same Exhibit also shows total expenditures of the Company in 2007 related to the provision, maintenance and upgrading of the facilities and services that are supported by Federal Universal Service Funding and further estimates these same expenditures for calendar years 2008, 2009 and 2010. Consistent with federal universal service principles, the Company will use federal universal service amounts received in those years to offset expenditures for those years. This use of federal universal service support will enable the Company to: (1) maintain rates for its local exchange services that are affordable and reasonably comparable to rates being charged for the same services in urban areas; and (2) to upgrade its telecommunications facilities and equipment as necessary to meet evolving service

requirements and maintain high quality service. The use of federal universal service support for these purposes is clearly consistent with the federal universal service provisions.

10. In addition to the information included in Exhibit A, the following information is provided to meet the Commission's "Certification requirements" set forth in 20:10:32:54:

- The Company's service quality improvement plan is to continue to upgrade its telecommunications facilities and equipment as necessary to meet evolving service requirements and maintain high quality service throughout its service area. As a competitive local exchange carrier willing to accept the carrier of last resort responsibilities in its service area, the Company upgrades and replaces facilities and equipment as necessary. In furtherance of its service quality improvement plan, the Company will use any high-cost universal service amounts received by it to offset expenditures incurred as it continues to upgrade and replace facilities and equipment. The Company's Actual Capital Expenditures for 2007 and Estimated 2008 Capital Expenditures are attached as Exhibit B. The Company's "two-year service quality improvement plan," required under the provisions of ARSD 20:10:32:54, is attached hereto as "Exhibit C."
- During calendar year 2007, the Company experienced no service outages affecting at least 10 percent of its end user customers, for a period lasting longer than 30 minutes.
- The Company was able to provide service to all potential customers that requested service during 2007, and as of December 31, 2007, the Company had no unfulfilled requests for service.
- During 2007, six (6) complaints were received by Knology of the Black Hills, LLC.
- Also attached as "Exhibit D" is a document containing other certifications, including those required under the provisions of ARSD §§ 20:10:32:54(5), 20:10:32:54(6), 20:10:32:54(7) and 20:10:32:54(8).

11. Based on all of the foregoing information, including the information provided on Exhibits A, B, C, and D the Company requests that this Commission issue an appropriate certification to the FCC and USAC indicating that Knology of the Black Hills, LLC is in compliance with 47 U.S.C. § 254(e) and should receive all federal universal service support determined for distribution to the Company in 2009. In order to ensure that this certification is

issued to the FCC prior to October 1, 2008, the Company would further ask the Commission to expedite the process that is initiated based on this filing.

Dated this 30th day of May 2008.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Kathryn E. Ford", written over a horizontal line.

Kathryn E. Ford
Director of Legal Affairs

EXHIBIT D - AFFIDAVIT

STATE OF SOUTH DAKOTA)
) ss.
COUNTY OF LINCOLN)

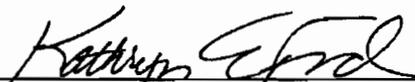
1. I am the Director of Legal Affairs of Knology of the Black Hills, LLC and am authorized to give this affidavit on behalf of the Company. This affidavit is provided to support the Company's Request for Certification to the South Dakota Public Utilities Commission as contemplated in 47 C.F.R. § 54.314.

2. As an authorized representative of the Company, I hereby affirm familiarity with and an understanding of the requirements of the Federal Communications Act of 1934, as amended by the Telecommunications Act of 1996, with respect to the receipt of any federal universal service funds received as high-cost loop support, local switching support, safety net additive support and/or safety valve support.

3. During 2007, the Company received federal universal service support as shown on Exhibit A to this affidavit and had investment and expenses relating to the provision, maintenance and upgrading of facilities and services for which such support was intended as also shown on Exhibit A. During 2007, the Company used the federal universal service support it received only for the provision, maintenance and upgrading of facilities and services for which the support was intended consistent with 47 U.S.C. § 254(e).

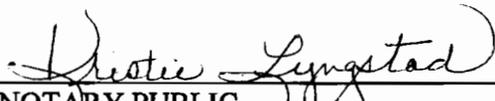
4. The Company will use the federal universal service support it receives during 2008 only for the provision, maintenance and upgrading of facilities and services for which the support is intended consistent with 47 U.S.C. § 254(e).

5. The Company (i) is in compliance with applicable service quality and consumer protection rules; (ii) is able to function in emergency situations; and (iii) provides equal access to long distance carriers.



Kathryn E. Rord
Director of Legal Affairs

Subscribed and Sworn to before me this 30th day of May 2008.



NOTARY PUBLIC

My Commission Expires: June 7, 2013

