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August 11, 2008

ARTHUR BLOOSTON  
1914 – 1999

\*LIMITED TO MATTERS AND PROCEEDINGS  
BEFORE FEDERAL COURTS AND AGENCIES.

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*Filed Electronically*

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

**Re: Brookings Municipal Utilities d/b/a Swiftel Communications Petition to Relinquish Its Designation as an Eligible Telecommunications Carrier**

Dear Ms. Van Gerpen:

Brookings Municipal Utilities d/b/a Swiftel Communications (Swiftel), by its attorneys, hereby submits this Petition to Partially Relinquish Designation as an Eligible Telecommunications Carrier, pursuant to § 47 USC 214(e)(4) of the Telecommunications Act of 1934, as amended in 1996, South Dakota Codified Laws § 49-31-78, and South Dakota Administrative Code § 20:10:32:48, for the specific areas of service indicated in the Petition. As indicated in the Certificate of Service, this document has been served on all interested parties.

Please direct any inquiries to the undersigned as counsel for Swiftel.

Sincerely,



Richard J. Helsper  
Glover & Helsper, P.C.  
445 Eighth Street South  
Brookings, SD 57006



John A. Prendergast  
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Counsel for Brookings Municipal  
Utilities d/b/a Swiftel

Attachments

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA**

**In the Matter of Brookings Municipal Utilities    )**  
**d/b/a Swiftel Communications Petition to        )**  
**Relinquish its Designation as an Eligible        )**     **Docket No. \_\_\_\_\_**  
**Telecommunications Carrier                        )**

**BROOKINGS MUNICIPAL UTILITIES D/B/A SWIFTEL COMMUNICATIONS  
PETITION TO PARTIALLY RELINQUISH ITS DESIGNATION AS AN  
ELIGIBLE TELECOMMUNICATIONS CARRIER**

1. Brookings Municipal Utilities d/b/a Swiftel Communications (Swiftel) hereby submits this petition for partial relinquishment of its designation as an eligible telecommunications carrier (ETC) for areas within its designated ETC area in South Dakota, pursuant to Section 214(e)(4) of the Communications Act of 1934, as amended in 1996 (the “Act”), Part 54 of the Federal Communications Commission’s (FCC) rules and regulations governing universal service, and South Dakota Administrative Code (the “Code”) Rule 20:10:32:48.

2. Swiftel is authorized by the FCC as a wireless Personal Communications Service (PCS) carrier in a portion of the Minneapolis-St. Paul Metropolitan Trading Area (MTA012), which Swiftel partitioned from an affiliate of Sprint. The partitioned area encompasses the South Dakota Counties of Brookings, Lake, Lincoln, McCook, Minnehaha, Moody, and Turner, in the Sioux Falls, South Dakota Basic Trading Area (BTA422); and Clark, Codington, Deuel, Grant, Hamlin, and Roberts Counties in the Watertown Basic Trading Area (BTA464). In addition, Swiftel partitioned from Sprint a portion of the Des Moines-Quad Cities, Iowa Major Trading Area (MTA032), encompassing the South Dakota Counties of Bon Homme, Clay, Union, and

Yankton, in the Sioux City, Iowa BTA421.<sup>1</sup> Swiftel was designated as an ETC in certain portions of its FCC authorized service area and for certain Qwest non-rural wire centers at the Commission's January 17, 2006 meeting.<sup>2</sup> The Universal Service Administrative Company (USAC) has assigned the Study Area Code 399009 to Swiftel.

3. In its designated ETC areas, Swiftel provides wireless voice, data and internet access services, through an affiliation arrangement with Sprint. Swiftel's affiliation arrangement with Sprint is due to expire by the terms of the parties' Affiliation Agreement (including related addenda) in March 2009. Swiftel has agreed to assign to Crossroads Wireless, Inc. ("Crossroads") a substantial portion of its FCC licenses, wireless system and related assets, since Crossroads desires to provide comparable wireless services following the expiration of the Sprint affiliation arrangement. Swiftel will maintain its wireless operations in portions of Brookings County, South Dakota<sup>3</sup>, since this county includes Swiftel's certificated telephone service area and the immediately surrounding rural communities.<sup>4</sup> Therefore, this petition seeks to amend the scope of Swiftel's ETC designation so as to exclude those areas that will be served by Crossroads after the transaction is consummated (with certain de minimus exceptions discussed below). The designated service areas for which Swiftel seeks to relinquish its ETC status are described in Exhibit A (non-rural wireline centers) and Exhibit B (rural service areas). The

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<sup>1</sup> *In The Matter Of The Filing By Brookings Municipal Utilities D/B/A Swiftel Communications For Designation As An Eligible Telecommunications Carrier*, Docket TC04-213, Order Granting Eligible Telecommunications Designation (February 10, 2006).

<sup>2</sup> *Id.*

<sup>3</sup> Swiftel is leasing its spectrum in certain less populated areas of Brookings County back to Crossroads, who will during the term of the lease provide service in these areas in a way that will allow Swiftel's customers to utilize their handsets over a wider portion of the County. Swiftel is therefore relinquishing its ETC status in portions of Brookings County to reflect this fact, and to avoid splitting wire centers as discussed below.

<sup>4</sup> Pursuant to mutual agreement with Sprint, Swiftel will continue to provide Sprint-branded services to its customers in the entire ETC area after the anticipated initial closing of the Crossroads transaction, up to a March 31, 2009 affiliation termination date.

areas in which Swiftel seeks to retain its ETC status are listed in Exhibit C hereto. Exhibit D hereto is a map depicting the areas for which ETC status would be retained (hereinafter the “Swiftel ETC Retained Area”).

4. The sale of Swiftel’s licenses and related wireless assets includes all network equipment used to provide service in the area which will then be served by Crossroads, including wireless transmitters, switching facilities, test equipment and retail centers. Crossroads will be using these licenses and assets to continue operating the business in those areas, without any substantial change or interruption of service. Crossroads will offer to serve all of Swiftel’s current customers in the relinquished area with a substantially similar suite of services and capabilities, using the same wireless network that is currently serving these customers.

5. Pursuant to §214(e)(4) of the Act and Rule 20:10:32:48 of the Code, the relinquishment of ETC designation requires the approval of the Commission, and the Commission “shall permit an eligible telecommunications carrier to relinquish its designation as [an ETC] in any area served by more than one eligible telecommunications carrier.” Rule 20:10:32:48 further states that “[p]rior to permitting a telecommunications carrier designated as an eligible telecommunications carrier to cease providing universal service in an area served by more than one eligible telecommunications carrier, the commission shall ensure that all customers served by the relinquishing carrier continues to be served, and shall require sufficient notice to permit the purchase or construction of adequate facilities by any remaining eligible telecommunications carrier.”

6. As demonstrated herein, Swiftel meets the requirements of § 214(e)(4) and Rule 20:10:32:48. First, each of the areas to be relinquished pursuant to this petition (listed in Exhibits A and B by service area) is currently served by at least one ETC-designated carrier. Besides Swiftel, each wire center listed in Exhibits A and B is served by an incumbent local exchange carrier that has ETC status.<sup>5</sup> Also, nearly every area to be relinquished is served by a wireless competitive local exchange carrier with ETC status.<sup>6</sup> Exhibits A and B list the incumbent for each service area in which Swiftel seeks to relinquish its ETC designation, as well as any competitive local exchange carriers known to Swiftel or apparent from available records. Second, as ETCs and Telecommunications carriers, these companies are required to provide service to everyone in their service areas, which would be all of the customers now served by Swiftel. Moreover, as discussed above, the customers served by Swiftel's existing wireless system will be given multiple written notices of the proposed transaction and offered substantially the same services, either by Swiftel (in the retained portions of Brookings County) or by Crossroads (using Swiftel's existing wireless assets in the areas to be relinquished). Therefore, customers who desire to transition to Crossroads will not experience a net loss of service.

7. As shown on the map in Exhibit D, there are certain areas in Brookings County for which Swiftel is proposing to relinquish ETC status, since each of these areas is either to be leased to

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<sup>5</sup> In 1997, the Commission granted US West (now Qwest) ETC status for each of the non-rural wireline centers listed in Exhibit A, except for North Sioux City and Ortonville, South Dakota. See *In the Matter of the Filing by US West Communications, Inc. for Designation as an Eligible Telecommunications Carrier*, Findings, Conclusions of Law, Order and Entry of Notice of Order, TC97-163. North Sioux City appears to be served by the wire center just across the border in Iowa, and Ortonville is a community primarily in the state of Minnesota, except for a small area just over the border in South Dakota. Presumably, the Commission determined that designation of these areas was not necessary and/or waived the need for designation in light of the geographic location of these areas in relation to out-of-state wire centers.

<sup>6</sup> The only exceptions are West Jasper, West Marietta and West Akron, which are areas located along the South Dakota border and are in close proximity to a neighboring community in another state.

Crossroads or is part of a wire center that is served by telephone exchange facilities in the adjoining county. In the latter category, Swiftel is proposing to relinquish the incidental portions of the Estelline, Toronto and Astoria exchanges that carry over into Brookings County, in order to avoid splitting a wire center. For the same reason, Brookings proposes to retain ETC status for two sparsely populated areas that incidentally extend into adjoining counties: The Sinai exchange is almost entirely in Brookings County, but small portions extend into Lake County and Kingsbury County, South Dakota; and a small portion of the Brookings-Rural exchange extends into Moody County, South Dakota. See Exhibit D hereto. By retaining these incidental extension areas, Swiftel would avoid splitting two wire centers for which it seeks to maintain its ETC status.<sup>7</sup>

8. It is respectfully submitted that the public interest would be served by allowing Swiftel to relinquish ETC status along wire center lines so as to eliminate from its ETC designation those areas that are included in the proposed Swiftel ETC Retained Area (shown in Exhibits C and D) from those areas located outside of it. There would be no element of “cream-skimming” if the Commission were to allow relinquishment of the wire centers as requested. Swiftel is already serving the areas for which it is retaining ETC status. Moreover, Swiftel would be retaining the low population density areas of each wire center in the Swiftel ETC Retained Area. Swiftel has legitimate operational reasons to continue operations in the Retained Area, which includes its telephone service area and immediately surrounding rural communities.

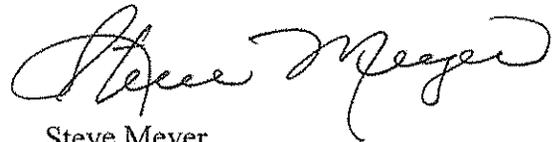
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<sup>7</sup> Both of these wire centers as well as certain others were redefined into a single “service area”, in the Commission’s February 10, 2006 order granting Swiftel ETC status *See n. 1, supra*, at pp. 6-7 para. f. The redefined service area in question includes the following Interstate Telecommunications Cooperative wire centers: Brookings Rural, Chester, Elkton, Nunda, Sinai, Wentworth and White.

9. In light of the foregoing, Swiftel respectfully requests that the Commission grant this Petition to Relinquish Eligible Telecommunications Carrier Designation and issue an Order amending the scope of Swiftel's designation as an ETC to exclude the areas and centers listed in Exhibits A and B. In order to ensure a smooth transition for the customers in the areas to be relinquished, Swiftel requests that this petition be granted on an expedited basis, so that Crossroads has ample time to assume control of the relevant portions of the wireless system and implement changes to network elements as necessary to serve these customers.

Respectfully submitted,

**BROOKINGS MUNICIPAL  
UTILITIES D/B/A SWIFTEL  
COMMUNICATIONS**



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Dated: August 11, 2008

**EXHIBIT A**

**Non-Rural Qwest Wireline Centers for which Swiftel Proposes to Relinquish ETC Status**

Wireline Center / CLLI Code	Incumbent Local Exchange Carrier	Competing Local Exchange Carrier
Colman - CLMNSDCO	Qwest <sup>1</sup>	VCI Company <sup>2</sup> Western Wireless, LLC <sup>3</sup>
Canton - CNTNSDCO	Qwest	VCI Company Western Wireless, LLC Midcontinent Communications <sup>4</sup>
Elk Point - ELPNSDCO	Qwest	VCI Company Western Wireless, LLC
Flandreau - FLNDSDCO	Qwest	VCI Company Western Wireless, LLC
Harrisburg - HRBGSDCO	Qwest	VCI Company Western Wireless, LLC Midcontinent Communications
Madison - MDSNSDCE	Qwest	VCI Company Western Wireless, LLC Midcontinent Communications
Ortonville - ORVLMNOR	Qwest	VCI Company Western Wireless, LLC Midcontinent Communications
Milbank - MLBNSDCO	Qwest	VCI Company Western Wireless, LLC Midcontinent Communications
North Sioux City - SXCYIADT	Qwest	VCI Company Western Wireless, LLC
Sioux Falls - SXFLSDCO	Qwest	VCI Company Western Wireless, LLC Midcontinent Communications
Tea – TEA SDCO	Qwest	VCI Company Western Wireless, LLC Midcontinent Communications
Vermillion - VRMLSDCO	Qwest	VCI Company Western Wireless, LLC
Watertown - WTTWSDCO	Qwest	VCI Company Western Wireless, LLC Midcontinent Communications
Yankton - YNTNSDCO	Qwest	VCI Company Western Wireless, LLC

## EXHIBIT A

### **Non-Rural Qwest Wireline Centers for which Swiftel Proposes to Relinquish ETC Status**

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<sup>1</sup> *In the Matter of the Filing by U S West Communications, Inc. for Designation as an Eligible Telecommunications Carrier, Findings, Conclusions of Law, Order and Entry of Notice of Order, TC97-163 (designating US West, now Qwest, as an ETC in all areas except North Sioux City and Ortonville).*

<sup>2</sup> *In the Matter of the Filing by VCI Company for Designation as an Eligible Telecommunications Carrier, Order Granting Eligible Telecommunications Designation, TC04-225.*

<sup>3</sup> *In the Matter of the Filing by GCC License Corporation for Designation as an Eligible Telecommunications Carrier, Order Designation GCC License Corporation as an Eligible Telecommunications Carrier in Non-Rural Telephone Company Exchanges, TC98-146.*

<sup>4</sup> *In the Matter of the Filing by Midcontinent Communications for Designation as an Eligible Telecommunications Carrier, Order Granting Eligible Telecommunications Designation, TC04-003.*

**EXHIBIT B**

**Rural Service Areas for which Swiftel Proposes to Relinquish ETC Status**

<b>Service Area / CLLI Code</b>	<b>Incumbent Local Exchange Carrier</b>	<b>Competitive Local Exchange Carrier</b>
Brandon – BRNDSDXA582 Garretson – GRSNSDXA59	Alliance Comm. Cooperative, Inc. (Splitrock) <sup>1</sup>	Wireless Alliance, LLC <sup>2</sup> Western Wireless LLC <sup>3</sup>
Alcester – ALCSSDXADS0 Baltic – BLTCSDXADS0 Crooks – CRKSSDXADS0 Hudson – HDSNSDXADS0	Alliance Comm. Cooperative, Inc. (Baltic) <sup>4</sup>	Wireless Alliance, LLC Western Wireless LLC
Beresford – BRFRSDXADS1	Beresford Municipal Telephone Co. <sup>5</sup>	Western Wireless LLC
Jefferson – JFSNSDXADS1	Jefferson Telephone Company <sup>6</sup>	Western Wireless LLC
Reville – RVLLSDXARS1 South Shore – SSHRSDXARS7 Stockholm – STKHSDXADS0	Stockholm-Strandburg Telephone Co. <sup>7</sup>	RCC Minnesota, Inc. <sup>8</sup> Western Wireless LLC
Hartford – HRFRSDXADS1 Wall Lake – HRFRSDXSDS2	Union Telephone Company <sup>9</sup>	Wireless Alliance, LLC Western Wireless LLC
Irene – IRENSDXARS1 Worthing – LNNXSDXARS1 Parker – PRKRSDXARS1 Hurley/Alsen/Flyger - VBRGSDAADS0 Wakonda – WKNDSDXARS1 Rural Beresford – LNNXSDXARS1	PrairieWave Community Telephone, Inc <sup>10</sup>	Wireless Alliance, LLC Western Wireless LLC
Colton – COTNSDXARS1 Dell Rapids – DLRPSDXADS0 Humboldt – HMBLSDXADS1	Sioux Valley Telephone Co. <sup>11</sup>	Wireless Alliance, LLC Western Wireless LLC
W. Jasper – NO CLLI KNOWN	Citizens Telecom Co. (MN) <sup>12</sup>	
West Marietta – MRTTMNXMRS6	Farmers Mutual Tel. Co. <sup>13</sup>	
Centerville – CNVLSDXARS1 Viborg – VBRGSDXARS1	Fort Randall Telephone Co. <sup>14</sup>	Western Wireless LLC
Tabor – TABRSDXARS1 Tyndall – TYNDSDXARS1	Fort Randall Telephone Co.	Western Wireless LLC
West Akron – AKRNIAAERS5 West Hawarden – HWRDIAAERS5	Heartland Telecom Company of Iowa <sup>15</sup>	
Astoria – ASTRSDXARS1 Bradley – BRDLSDXARS1 Brandt – BRNTSDXARS2 Bryant – BRYNSD01RS0 Castlewood – CSWDSDXARS1 Clark – CLRKSDXADS0 Clear Lake – CLLKSDXA874 Estelline – ESTLSDXA873 Florence – FLRNSDXARS1 Gary – GARYSDXA27A Goodwin – GDWNSDXARS4 Hayti – HAYTSDXARS1 Lake Norden – LKNRSD01RS0 Toronto – TOROSDXARS5 Willow Lake – WLLKSDXARS6	Interstate Telecom Cooperative, Inc. (SD)	RCC Minnesota, Inc. Western Wireless LLC

## EXHIBIT B

### Rural Service Areas for which Swiftel Proposes to Relinquish ETC Status

Chester – CHESDXARS1* Nunda – NUNDSDXARS2 Wentworth – WNWOSDXARS4 Elkton – EKTNSDXARS3 White - WHTESDXE	Interstate Telecom Cooperative, Inc. (SD)	Western Wireless LLC
N. Larchwood – LRWDIAXO474 Valley Springs – VYSPSDXA757	Hills Telephone Company <sup>16</sup>	Western Wireless LLC
West Hendricks – HNDRMNXHRS2	Interstate Telecom Cooperative, Inc. (SD)	Western Wireless LLC

**\* This service area was redefined by the Commission as part of Swiftel's ETC designation order to include the following wire centers: Brookings-Rural, Chester, Elkton, Nunda, Sinai, Wentworth, and White. Swiftel proposes to relinquish ETC status in this service area in only those wire centers listed above. Swiftel would maintain ETC status in the wire centers of Brookings-Rural and Sinai, which were grouped into this service area.**

## EXHIBIT B

### Rural Service Areas for which Swiftel Proposes to Relinquish ETC Status

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<sup>1</sup> *In the Matter of the Filing by Splitrock Properties, Inc. for Designation as an Eligible Telecommunications Carrier*, Findings of Fact, Conclusions of Law, Order, and Notice of Entry of Order, TC97-101.

<sup>2</sup> *In the Matter of the Filing by RCC Minnesota, Inc. and Wireless Alliance, L.L.C. d/b/a Unicel for Designation as an Eligible Telecommunications Carrier*, Findings of Fact, Conclusions of Law, Order, and Notice of Entry of Order, TC03-193.

<sup>3</sup> *In the Matter of the Filing by GCC License Corporation for Designation as an Eligible Telecommunications Carrier*, Order Designating Western Wireless as an ETC for Areas Served by Certain Rural Telephone Companies, TC98-146 and *In the Matter of the Filing by WWC License LLC, d/b/a CellularOne for Designation as an Eligible Telecommunications Carrier*, Order Approving ETC Order, TC03-191.

<sup>4</sup> *In the Matter of the Filing by Baltic Telecom Cooperative for Designation as an Eligible Telecommunications Carrier*, Findings of Fact, Conclusions of Law, Order, and Notice of Entry of Order, TC97-087.

<sup>5</sup> *In the Matter of the Filing by Beresford Municipal Telephone Co. for Designation as an Eligible Telecommunications Carrier*, Findings of Fact, Conclusions of Law, Order, and Notice of Entry of Order, TC97-098.

<sup>6</sup> *In the Matter of the Filing by Jefferson Telephone Co., Inc. for Designation as an Eligible Telecommunications Carrier*, Findings of Fact, Conclusions of Law, Order, and Notice of Entry of Order, TC97-093.

<sup>7</sup> *In the Matter of the Filing by Stockholm-Strandburg Telephone Company for Designation as an Eligible Telecommunications Carrier*, Findings of Fact, Conclusions of Law, Order, and Notice of Entry of Order, TC97-090.

<sup>8</sup> *See supra*, fn. 2.

<sup>9</sup> *In the Matter of the Filing by Union Telephone Company for Designation as an Eligible Telecommunications Carrier*, Findings of Fact, Conclusions of Law, Order, and Notice of Entry of Order, TC97-115.

<sup>10</sup> *In the Matter of the Petition of Dakota Community Telephone, Inc. and McLeod USA Telecom Development, Inc. for Approval of the Transfer of their Stock to PrairieWave Communications, Inc.* Final Decision and Order Approving Transfer of Stock and Telephone Exchanges; Notice of Entry of Order, TC02-062; *In the Matter of the Request of PrairieWave Community Telephone, Inc. for Certification Regarding its Use of Universal Service Support*, Order Granting Certification, TC07-063.

<sup>11</sup> *In the Matter of the Filing by Sioux Valley Telephone Company for Designation as an Eligible Telecommunications Carrier*, Findings of Fact, Conclusions of Law, Order, and Notice of Entry of Order, TC97-073.

<sup>12</sup> *In the Matter of the Filing by Citizens Telecommunications Company of Minnesota, LLC for a Waiver of ARSD § 20:10:32:56*, Order Granting Waiver and Certification, TC07-086.

<sup>13</sup> *In the Matter of the Filing by Farmers Mutual Telephone Company for Designation as an Eligible Telecommunications Carrier*, Findings of Fact, Conclusions of Law, Order, and Notice of Entry of Order, TC97-183.

<sup>14</sup> *In the Matter of the Filing by Fort Randall Telephone Company for Designation as an Eligible Telecommunications Carrier*, Findings of Fact, Conclusions of Law, Order, and Notice of Entry of Order, TC97-075.

<sup>15</sup> *In the Matter of the Filing by Heartland Telecommunications Company of Iowa d/b/a Hickory Tech Corporation for Designation as an Eligible Telecommunications Carrier*, Findings of Fact, Conclusions of Law, Order, and Notice of Entry of Order, TC97-195.

<sup>16</sup> *In the Matter of the Filing by Hills Telephone Company, Inc. for Designation as an Eligible Telecommunications Carrier*, Findings of Fact, Conclusions of Law, Order, and Notice of Entry of Order, TC04-204.

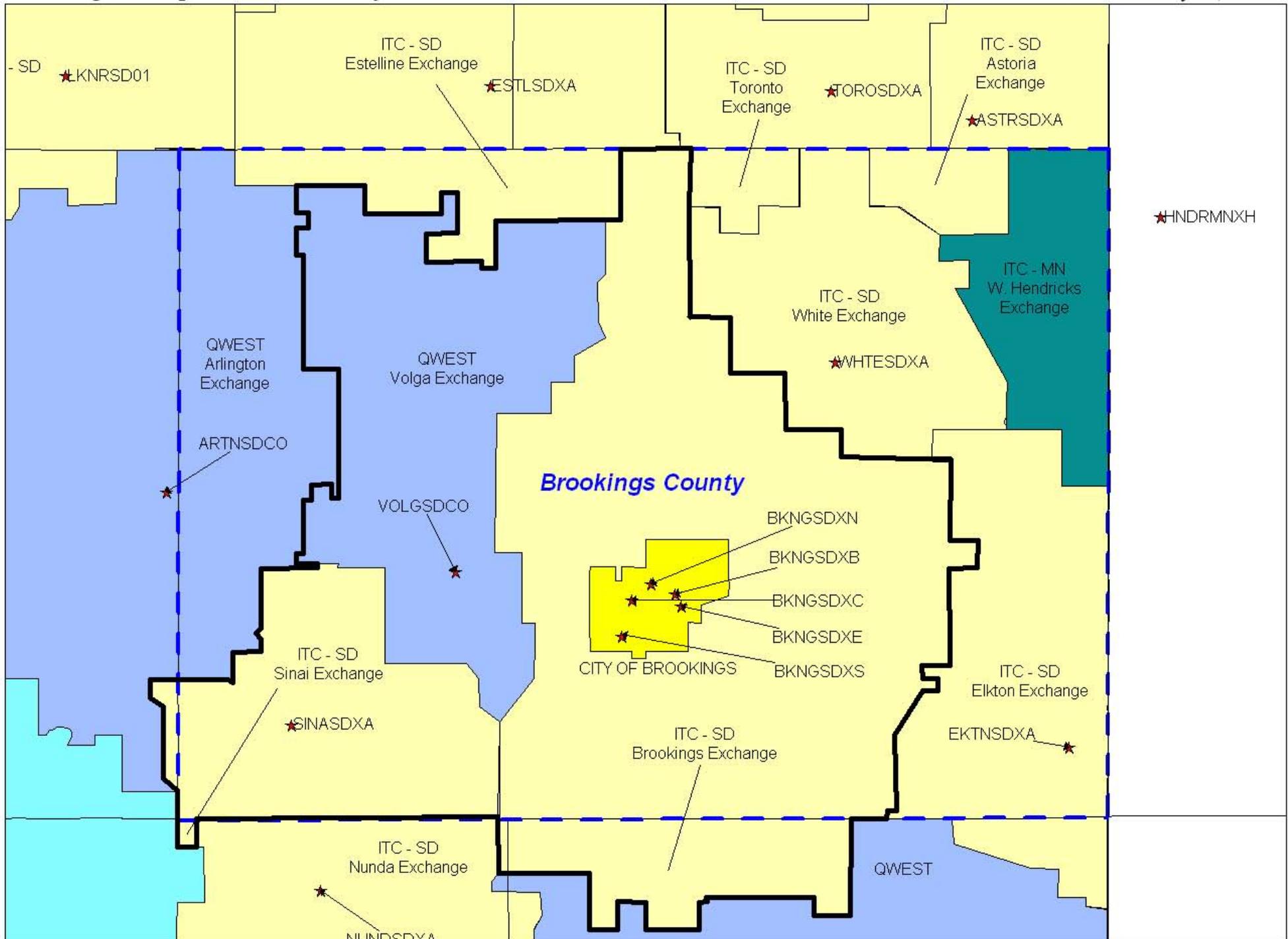
## EXHIBIT C

### Areas for which Swiftel Proposes to Retain ETC Status

Area or Wire Center	CLLI Code(s)
City of Brookings	BKNGSDXC BKNGSDXN BKNGSDXB BKNGSDXE
Brookings-Rural	BKNGSDXB69G
Sinai	SINASDXARS3
Volga	VOLGSDCO

**EXHIBIT D**

**Map of Areas for which Swiftel Proposes to Retain ETC Status**



## CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 11th day of August, 2008, a copy of the **Brookings Municipal Utilities D/B/A Swiftel Communications Petition to Relinquish its Designation as an Eligible Telecommunications Carrier** via US Mail, postage prepaid, to the following:

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Interstate Telecommunications Cooperative  
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PO Box 920  
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Beresford Municipal Telephone Company  
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General Manager  
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Beresford, SD 57004

Jefferson Telephone LLC d/b/a Long Lines  
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Citizens Telecommunications Company of  
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