
BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA

SOUTH DAKOTA NETWORK, LLC'S,
APPLICATION FOR WAIVER OF
SWITCHED ACCESS COST STUDY

Docket No. TC-_____

APPLICATION FOR WAIVER OF
SWITCHED ACCESS COST STUDY

South Dakota Network, LLC (“SDN”) respectfully requests that the South Dakota Public Utilities Commission (“Commission”) grant a waiver, pursuant to ARSD § 20:10:27:02, of the requirement to perform a switched access cost study. SDN makes this Application based on the following:

1. ARSD § 20:10:27:07 requires a carrier’s carrier to file cost data in support of its switched access service tariff no less than once every three years. ARSD § 20:10:27:02 provides that the Commission may, for good cause shown, either by its own motion or by application from a carrier’s carrier, temporarily waive or suspend any rule in chapter 20:10:27. SDN notes that the Commission has in the past granted such waivers to SDN and other carriers.

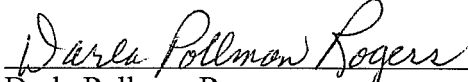
2. The Commission approved SDN’s 2001 intrastate switched access rates on October 23, 2003, in Docket TC02-091, after a thorough review of the cost study filed by SDN in that docket. In May of 2005 and April of 2008, SDN applied for a waiver from the requirement to file a cost study, which applications were granted by this Commission. (See Dockets TC05-062 and TC08-037).

3. SDN hereby requests a waiver of the cost study requirements, for the following reasons:

- (1) Producing such a study is costly and consumes a great deal of time and resources. SDN does not have the internal experts necessary to determine cost-based intrastate access rates and would have to employ the services of outside consultants. This additional expense would not result in any meaningful benefits to consumers of SDN's services;
- (2) SDN does not anticipate raising access rates at this time; and
- (3) Preliminary analysis indicates that a cost study would support higher rates.

WHEREFORE, SDN requests the Commission to temporarily waive or suspend the requirement in ARSD § 20:10:27:07 for the current period, based on the good cause recited above.

DATED this 7th day of June, 2011.


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