

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

In the Matter of the Application of Wide Voice, LLC for a Certificate of Authority to Provide Local Exchange Service within the service area now served by Qwest.

DOCKET NO. 11-088

**PETITION FOR INTERVENTION BY AT&T COMMUNICATIONS OF THE
MIDWEST, INC.**

Pursuant to ARSD Sec. 20:10:01:15.02, AT&T Communications of the Midwest, Inc., (“AT&T”) petitions for leave to intervene in the above captioned proceeding.

1. AT&T is an interexchange telecommunications carrier authorized to do business in South Dakota.
2. Wide Voice LLC (“WV”) proposes to become a competitive local exchange carrier (“CLEC”) ¹ within Qwest’s territory as outlined in its Application for Certificate of Authority (“COA”) filed on October 27, 2011.
3. WV indicates that it intends to provide local services immediately upon certification using its own facilities, and will provide interexchange toll services through resale, and requests a waiver of the requirement to produce cost support while not stating what rates it will charge for noncompetitive services.
4. As an interexchange carrier, AT&T is required to pay intrastate access fees to CLECs, such as WV should it be granted a COA. AT&T has a direct interest in the outcome of this proceeding which may directly or indirectly affect the cost of telecommunications services that it provides to its long distance customers in South Dakota. Pursuant to ARSD 20:10:01:15:05, it qualifies for intervention as its interest is distinguishable from an interest common to the public or taxpayers in general.

WHEREFORE, AT&T requests that it be granted intervention status in this proceeding.

¹ WV files under ARSD Sec. 20:10:24:02, entitled “Interexchange carrier and classification rules.” However, WV indicates that it initially seeks certification in order to “provide local service...” immediately upon certification. WV has not, however, made this filing for a COA under the rules applicable to certification of a local exchange carrier, nor has it provided all of the information required under ARSD Sec. 20:10:32:03. At a minimum WV should be required to update its COA filing to comply with the appropriate rules prior to the establishment of a procedural schedule.

Date this 18th day of November, 2011.

Signed electronically

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was sent electronically to the following on the 18th day of November 2011:

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