

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA

In the Matter of the Application of)
Wide Voice, L.L.C. for a Certificate)
of Authority to Provide Local)
Exchange Services in South Dakota)

TC11-088

SPRINT'S PETITION FOR INTERVENTION

COMES NOW, Sprint Communications Company, LP, ("Sprint"), by and through its counsel, and pursuant to A.R.S.D. § 20:10:01:15:02, files this Petition for Intervention, and in support thereof states as follows:

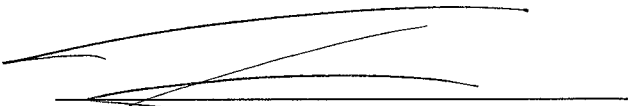
1. Sprint is a corporation with its principal place of business at 6450 Sprint Parkway, Overland Park, Kansas 66251. Sprint is authorized to transact business in the State of South Dakota.
2. Sprint is a provider of interexchange services (IXC) and commercial mobile radio services ("CMRS").
3. As a provider doing business in South Dakota, Sprint is an interested party in this proceeding as it may result in the implementation of pricing and traffic pumping activities in South Dakota directly impacting Sprint's operations.
4. Wide Voice, L.L.C. ("Wide Voice") is a well known traffic pumper that participates in traffic pumping schemes artificially inflating traffic it then claims is access traffic to bill IXCs. Therefore, Sprint has a direct interest in this proceeding and the business activities of Wide Voice.
5. Furthermore, Wide Voice's application fails to set forth necessary information required in A.R.S.D. 20:10:24:02. The application fails to provide "a list and specific

description of a telecommunication services application the applicant intends to offer,” A.R.S.D. 20:10:24:02(6); “a detailed statement of how the applicant will provide its services,” A.R.S.D. 20:10:24:02(7); a South Dakota Sales Tax number, A.R.S.D. 20:10:24(17); necessary information concerning how rates will be determined and billed, A.R.S.D. 20:10:24(11) through (14); and, to fulfill the obligations of the basic requirements of the application in other ways.

WHEREFORE, Sprint respectfully requests that the Commission grant it status as an Intervenor in this matter and, as such, that Sprint be allowed to participate in this matter as provided under the South Dakota Public Utilities Commission rules and state and federal laws.

Dated this 18th day of November, 2011.

**SPRINT COMMUNICATIONS
COMPANY, LP**



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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Sprint's Petition for Intervention and Request for Investigation (Docket TC11-088) was delivered by electronic mail this 18th day of November, 2011, to the following:

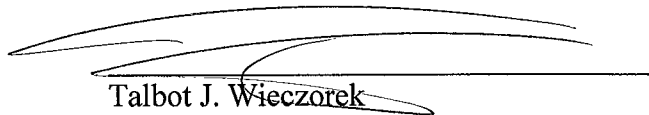
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