

**BEFORE THE
SOUTH DAKOTA PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF THE PETITION OF
INTERSTATE TELECOMMUNICATIONS
COOPERATIVE, INC. FOR
ESTABLISHMENT OF RATE CENTER

TC 11-089

**Responses to Staff's
First Set of Data Requests**

COMES NOW, Interstate Telecommunications Cooperative, Inc., by and through its undersigned counsel, and hereby submits the following responses to Staff's First Set of Data Requests.

RESPONSES TO STAFF'S DATA REQUESTS

1-1) Please explain any benefits ITC's customers will see as a result of the establishment of the "Brookings Rural" rate center.

RESPONSE: It is highly unlikely that ITC's customers will notice any change with the establishment of a formal Brookings Rural Rate Center; however, the formal establishment of the Brookings Rural Rate Center will ensure proper routing of phone calls.

1-2) Will ITC's customers currently in the Brookings area be negatively affected in any way with the establishment of the "Brookings Rural" rate center?

RESPONSE: No. No change in services or pricing is planned or anticipated.

1-3) Please provide a map of ITC's service territory in the Brookings area, detailing which customers will be a part of the "Brookings Rural" rate center, as proposed.

RESPONSE: ITC is presently preparing a map and it will be submitted as soon hereafter as reasonably practicable.

1-4) Does the "Brookings Rural" rate center include customers both inside and outside the Brookings city limits?

RESPONSE: Yes.

1-5) Are the calls an ITC customer in the Brookings area makes to a Swiftel Communications customer currently considered local calls? If so, will these still be considered local calls with the establishment of the "Brookings Rural" rate center? If not, what additional charges currently apply and/or will apply?

RESPONSE: ITC's customers in the Brookings area are currently able to subscribe to ITC's optional extended area calling plan to make calls to Swiftel Communications customers without

incurring long distance charges for each call. There is no anticipated change to ITC's optional extended area calling plan.

Dated this 28th day of November, 2011.

Respectfully submitted,



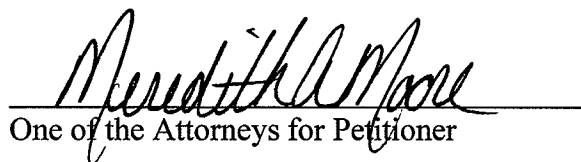
Ryan J. Taylor
Meredith A. Moore
Cutler & Donahoe, LLP
100 N. Phillips Ave., 9th Floor
Sioux Falls, South Dakota 57104-6725
Telephone: (605) 335-4950
Facsimile: (605) 335-4961
ryant@cutlerlawfirm.com
meredithm@cutlerlawfirm.com
*Attorneys for Interstate Telecommunications
Cooperative, Inc.*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was sent electronically to the following on this 28th day of November, 2011:

Ms. Karen E. Cremer
Staff Attorney
South Dakota Public Utilities Commission
500 E. Capitol Ave.
Pierre, SD 57501
karen.cremer@state.sd.us
(605) 773-3201 – voice
(866) 757-6031 - fax

Ms. Brittany Mehlhaff
Staff Analyst
South Dakota Public Utilities Commission
500 E. Capitol Ave. Pierre, SD 57501
brittany.mehlhaff@state.sd.us
(605) 773-3201 - voice
(866) 757-6031 – fax



One of the Attorneys for Petitioner