BEFORE THE SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE REQUEST OF INTERSTATE TELECOMMUNICATIONS	
COOPERATIVE, INC. FOR CERTIFICATION REGARDING ITS USE	ANNUAL ETC CERTIFICATION FILING
OF FEDERAL UNIVERSAL SERVICE) SUPPORT.	

INTERSTATE TELECOMMUNICATIONS COOPERATIVE, INC. (the "Company"), by and through its attorney, makes this filing to seek certification from the South Dakota Public Utilities Commission (the "Commission") as is required under 47 C.F.R. § 54.314 and to comply with the provisions of ARSD §§ 20:10:32:52 and 20:10:32:54 of the Commission's rules pertaining to eligible telecommunications carriers ("ETCs").

In accordance with 47 C.F.R. § 54.314, federal universal service support provided to carriers pursuant to 47 C.F.R. §§ 54.301, 54.305 and/or 54.307 and/or Part 36, Subpart F (high-cost loop support, local switching support, safety net additive support and safety valve support) will be made available only if the State Commission files the requisite annual certification with the FCC and USAC. The certification required specifically for rural carriers to receive federal universal service support for all four quarters during calendar year 2013 is currently due to be filed with the FCC and USAC on or before October 1, 2012. The certification may be presented to these entities in the form of a letter from the State Commission. The letter must identify which carriers in the State are eligible to receive federal support during the 12-month period and must certify that the carriers listed will only use the support for the provision, maintenance and upgrading of facilities and services for which the support is intended.

As part of its annual request to the Commission for certification, the Company provides the following information:

- 1. The Company is a rural telephone company that has previously been designated by this Commission as an ETC. The Company provides local exchange telephone services, including all of the essential services that are included in the federal definition of universal service, to approximately 12,100 access lines within its established rural service area in South Dakota.
- 2. The provisions of ARSD § 20:10:32:54 addressing the annual "Certification requirements" set forth by this Commission indicate in part that the ETC must show "how much universal service support was received." Accordingly, the Company's 2011 federal universal service receipts are reflected on Exhibit A hereto (presented as part of the Company's "Progress Report"). This same Exhibit also shows total expenditures of the Company in 2011 related to the provision, maintenance and upgrading of the facilities and services that are supported by federal universal service funding. In addition, to the extent changes have occurred, to date, with respect to the Company's planned 2012 investments noted in last year's two-year plan, the changes are referenced in that Exhibit. Estimates of the expenditures to be made by the Company for calendar year 2013, related to the provision, maintenance, and upgrading of facilities and services supported by federal universal service, are provided on Exhibit B hereto as part of the

Company's current Two-Year Plan. Consistent with federal universal service principles, the Company will use federal universal service amounts received in 2013 to offset a portion of these 2013 expenditures. This use of federal universal service support will enable the Company to: (1) maintain rates for its local exchange services that are affordable and reasonably comparable to rates being charged for the same services in urban areas; and (2) to upgrade its telecommunications facilities and equipment as necessary to meet evolving service requirements and maintain high quality service. The use of federal universal service support for these purposes is clearly consistent with the federal universal service provisions.

- 3. In addition to the information included in Exhibits A and B, the following information is provided to meet the Commission's "Certification requirements" set forth in § 20:10:32:54:
- During calendar year 2011, the Company experienced the following service outages affecting at least 10 percent of its end user customers, for a period lasting longer than 30 minutes:
 - 1/20/11 Voice/Video/Data outage in Rural Wentworth, Chester, Sinai and Nunda.
 Outage was due to complications during Calix software upgrade
 - 880 customers affected
 - Outage duration: Voice services down two hours, Video and Data 4 hours
 - Prevention: Performed planned system outage on 10/19/11 to split the network up in to two separate rings
 - 8/25/11 Dial tone outage in rural Clark, Bryant, Lake Norden, Willow Lake, Hayti and Henry. Outage was due to a switch software lockup in the Nortel GR303 bay
 - 1930 customers affected
 - Outage duration 2 hours
 - Prevention: The Clark DMS10 switch will be changed out to a Genband C15 soft switch this should eliminate the alarming overflow issue on the GR303.
 - 10/19/11 Voice/Video/Data planned service outage in Rural Chester and Sinai due to Calix Network rearrange. Rearranging was for diversification.
 - 430 customers affected
 - Outage Duration Voice/Video and Data nine hours
 - Prevention: Write a script to be ready in case manual intervention is needed to turn up DT if Calix and Genband systems fail to do so, Brookings DMS10 switch will also be changed out this year to a Genband soft switch hopefully this will eliminate the software confusion between the two systems
- The Company was able to provide service to all potential customers that requested service during 2011, and as of December 31, 2011 the Company had no unfulfilled requests for service.
- During 2011, the Company's customer service department received an estimated one complaint from consumers. None of these complaints were received by the Company more formally as written complaints or as complaints that needed to be resolved with the

involvement of other Company representatives outside of the customer service department.

- Also attached as "Exhibit C" is a document containing other certifications, including those required under the provisions of ARSD §§ 20:10:32:54(6), 20:10:32:54(7), 20:10:32:54(8) and 20:10:32:54(9).
- 4. Based on all of the foregoing information, including the information provided on Exhibits A, B and C, the Company requests that this Commission issue an appropriate certification to the FCC and USAC indicating that *INTERSTATE TELECOMMUNICATIONS COOPERATIVE*, *INC*. is in compliance with 47 U.S.C. § 254(e) and should receive all federal universal service support determined for distribution to the Company in 2012. In order to ensure that this certification is issued to the FCC prior to October 1, 2012, the Company would further ask the Commission to expedite the process that is initiated based on this filing.

Dated this 25th day of May 2012.

Respectfully submitted.

Attorney for the Company