



14450 Burnhaven Drive
Burnsville, MN 55306

May 31, 2012

Ms. Patricia Van Gerpen
Executive Director
South Dakota Public Utilities Commission
Capitol Building – 1st floor
500 East Capitol Avenue
Pierre, South Dakota 57501-5070

Dear Ms. Van Gerpen:

Citizens Telecommunications Company of Minnesota, LLC, (CTC MN) respectfully files for a waiver of the Commission's ETC filing requirements pursuant to ARSD 20:10:32:56, on the ground that the reporting requirements in support of ETC certification are unduly burdensome and unnecessary. CTC MN also requests the Commission to certify CTC MN as an ETC in its annual ETC certification.

Under the FCC's rules at 47 CFR § 54.314, State certification of support for rural carriers:

(b) Carriers not subject to State jurisdiction. A rural incumbent local exchange carrier not subject to the jurisdiction of a state or an eligible telecommunications carrier not subject to the jurisdiction of a state serving lines in the service area of a rural incumbent local exchange carrier that desires to receive support pursuant to Sec. Sec. 54.301, 54.305, and/or 54.307 and/or part 36, subpart F of this chapter shall file an annual certification with the Administrator and the Commission stating that all federal high-cost support provided to such carriers will be used only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.

A portion of CTC MN's Jasper, Minnesota exchange extends into South Dakota and serves 64 access lines in South Dakota. The Jasper exchange central office switch is located in Minnesota and the study area is under Minnesota jurisdiction. CTC MN completed an extensive ETC certification filing with the Minnesota Commission on May 30, 2012 and expects to receive re-certification. For the Commission's reference, I attach a copy of our Minnesota filing.

Based on the above regulation, because the study area is subject to Minnesota jurisdiction, it is at least arguable that CTC MN could self-certify to the Administrator (the Universal Service Administrative Company) and the FCC. However, out of an abundance of caution, CTC MN hereby requests certification from the South Dakota PUC for our 64 access lines in South Dakota.

Completing a full ETC certification filing for South Dakota would be unduly burdensome because only .07% of the CTC MN customer base are South Dakota residents. The switches and vast majority of outside plant that supports the South Dakota customers are located within Minnesota. It is burdensome to extrapolate specific costs and projects specific to South Dakota customers.


Therefore, CTC MN is requesting a permanent waiver of the ETC filing requirements, pursuant to ARSD 20:10:32:56.

CTC MN is attaching an affidavit stating it will only use the federal high-cost support it receives during 2013 for the provision, maintenance and upgrading of facilities and services for which such support is intended.

CTC MN been designated as an Eligible Telecommunications Carrier (“ETC”) by the Commission in the past and requests the Commission include CTC MN in its certification to the Universal Service Administrative Company and the Federal Communications Commission.

If there are any questions please feel free to me at (952) 435-1356.

Sincerely,

A handwritten signature in cursive script that reads "Stephen H. Hegdal".

Stephen H. Hegdal
Manager – Compliance and Reporting
Frontier Communications

Attachment