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

IN THE MATTER OF THE PETITION	)	
FOR APPROVAL OF AN AMENDMENT	)	DOCKET TC13-023
TO THE ACCESS TARIFFS OF	)	
INTERSTATE TELECOMMUNICATIONS	5)	
COOPERATIVE, INC.	)	

## PETITION TO INTERVENE ON BEHALF OF LOCAL EXCHANGE CARRIERS ASSOCIATION

The Local Exchange Carriers Association ("LECA") hereby petitions the South Dakota Public Utilities Commission ("Commission") for intervention in the above captioned proceeding pursuant to SDCL § 1-26-17.1 and ARSD §§ 20:10:01:15.02, 20:10:01:15.03 and 20:10:01:15.05. In support thereof, LECA states as follows:

- 1. On February 28, 2013, Interstate Telecommunications Cooperative, Inc. ("ITC") a local exchange carrier in South Dakota and a member of the Local Exchange Carrier Association (LECA), filed a petition with this Commission requesting approval of an amendment to ITC's tariff.
- 2. In its petition, ITC states that this Commission issued an amended Certificate of Authority to ITC on November 29, 2012, authorizing ITC to offer local exchange service to the former customers of Stockholm-Strandburg Telephone Company ("Stockholm-Strandburg"). The Certificate of Authority of SSTI was also amended to permit ITC to operate as a competitive local exchange carrier in the exchanges served by SSTI. According to ITC's petition, as of January 1, 2013, Stockholm-Strandburg was merged with and into ITC.
- 3. LECA is an Association comprised of rural incumbent local exchange carriers ("LECs") operating in the State of South Dakota. LECA administers a voluntary pooling

mechanism and association tariff for the benefit of its member companies. The LECA Tariff

filed with this Commission and revised from time to time establishes the originating and

terminating switched access rates that are charged by the LECA member companies to other

carriers utilizing switched access services.

4. LECA most recently amended its Tariff in docket TC12-040, effective July 1,

2012. Both ITC and Stockholm-Strandburg are part of the current LECA tariff.

5. According to the Petition, ITC does not seek to change any of the terms and

conditions nor its continued participation in and operation under the LECA tariff. Stockholm-

Strandburg however, merged into ITC as of January 1, 2013, and is no longer an "issuing

carrier" under the LECA tariff.

6. Due to the mergers of SSTI into Stockholm-Strandburg and then Stockholm-

Strandburg into ITC, revisions are necessary to both the SSTI tariff and to the LECA tariff. ITC

is seeking revisions to the SSTI tariff in the current docket.

7. LECA seeks intervention in this docket in order to revise the LECA tariff to

remove Stockholm-Strandburg as an issuing carrier under the LECA tariff (Pages 17-1 and 17-

4.19 of the LECA tariff, and any other necessary pages of the Tariff).

Based on the foregoing, LECA is an interested party in this matter and would seek

intervening party status.

Respectfully submitted this 22<sup>nd</sup> day of March, 2013.

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