

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

**IN THE MATTER OF THE AMENDED  
APPLICATION OF INTRADO  
COMMUNICATIONS INC. FOR A  
CERTIFICATE OF AUTHORITY TO  
PROVIDE INTEREXCHANGE SERVICE  
WITHIN THE STATE OF SOUTH  
DAKOTA**

**DOCKET NO. TC14-002**

**AMENDED APPLICATION -- REVISED**

Application is hereby made to the South Dakota Public Utilities Commission (“Commission”) pursuant to S.D. Admin. R. 20:10:24:02 for an Order granting Intrado Communications Inc. (“Intrado Communications” or “Applicant”) a Certificate of Authority (“COA”) to provide interexchange services in the State of South Dakota.<sup>1</sup> Applicant is a wholly owned subsidiary of Intrado Inc., which is owned by West Corporation. The issuance of a COA to Intrado Communications to provide interexchange services is in the public interest.

The following information is furnished in support of this application:

**(1) The applicant’s name, address, telephone number, facsimile number, web page URL, and E-mail address:**

Name: Intrado Communications Inc.  
Address: PO Box 999  
Longmont CO 80503  
Telephone: (720) 494-5800  
Fax: (720) 494-6600  
URL: <http://www.intrado.com>  
E-mail: [regulatory@intrado.com](mailto:regulatory@intrado.com)

**(2) A description of the legal and organizational structure of the applicant’s company:**

Applicant is a Delaware corporation. A copy of Applicant’s Articles of Incorporation is

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<sup>1</sup> Intrado Communications is revising its Amended Application filed on July 25, 2014. Intrado Communications’s Application for a COA to provide local exchange services was filed with the Commission on February 20, 2014, and later amended on August 29, 2014.

attached as Exhibit A. A copy of Applicant's current organization chart is attached as Exhibit B.

**(3) The name under which applicant will provide local exchange and interexchange services if different than in subdivision (1) of this section:**

Intrado Communications Inc. will be the entity providing interexchange services in South Dakota.

**(4) A copy of the applicant's certificate of authority to transact business in South Dakota from the Secretary of State:**

Applicant is a Delaware corporation. A copy of Applicant's certificate of authority to transact business in South Dakota is attached as Exhibit C.

**(5) The location of the applicant's principal office, if any, in this state and the name and address of its current registered agent, if applicable:**

Applicant does not have a principal office located in South Dakota. The name and address of Applicant's current registered agent is:

Corporation Service Company  
503 South Pierre Street  
Pierre, SD 57501

**(6) A list and specific description of the telecommunications services the applicant intends to offer:**

Applicant will provide local exchange services to government and quasi-government Public Safety Answering Points ("PSAPs"). Intrado Communications' retail 9-1-1 service to PSAPS permits 9-1-1 call takers to receive emergency calls placed by the telco's end users who dial "9-1-1" and emergency communications originated by personal communications devices. This service is a replacement for the 9-1-1 service currently provided by the ILEC. Intrado Communications provides a complete end-to-end service for the PSAP, which includes services such as selective routing and the databases used for the delivery of the 9-1-1 call with the appropriate location information.

Intrado Communications' services include the ability for a PSAP to transfer a call to another PSAP located in a different local exchange that is served from a different selective router ("SR"). As a result, Intrado Communications is seeking a COA to provide intrastate interexchange services.

A diagram that details Intrado Communications' services is attached hereto as Exhibit D. The connectivity for PSAP-to-PSAP call transfers or handoffs that require intrastate interexchange services are indicated in **red**.

**(7) A detailed statement of how the applicant will provide its services:**

Applicant has its own switching facilities located in other states and will lease transmission facilities as necessary from other authorized facilities providers in South Dakota. Applicant may in the future install switching facilities in South Dakota, but has not yet determined where those facilities will be located.

**(8) A service area map or narrative description indicating with particularity the geographic area proposed to be served by the applicant:**

Applicant intends to offer its services throughout the State of South Dakota.

**(9) For the most recent 12-month period, financial statements of the applicant consisting of balance sheets, income statements, and cash flow statements. The applicant shall provide audited financial statements, if available:**

Applicant is not a publicly traded company and relies on the financial resources of its parent corporation, West Corporation. The link below provides the web site page for West Corporation's 2013 Annual Report:

<http://investor.shareholder.com/west/financials.cfm>

**(10) The names, addresses, telephone number, facsimile number, E-mail address, and toll free number of the applicant's representatives to whom all inquiries must be made regarding complaints and regulatory matters and a description of how the applicant handles customer service matters:**

Customer Complaints:

Customer Support  
Intrado Communications Inc.  
1601 Dry Creek Drive  
Longmont, CO 80503  
Toll Free: 877-214-3032  
Facsimile: 720-494-6600  
regulatory@intrado.com

Regulatory issues:

Mary Jane Rasher  
Director, Regulatory and Government Affairs  
Intrado Communications Inc.  
1601 Dry Creek Drive  
Longmont, CO 80503  
Telephone: 720-494-5849  
Facsimile: 720-494-6600  
regulatory@intrado.com

Applicant has customer service personnel available during normal business hours to respond to customer inquiries and complaints. Applicant also employs personnel that monitor its network 24/7 to ensure appropriate service levels are maintained.

Applicant will provide its services through a contract with the customer. Intrado Communications has a dedicated team that addresses all customer service matters. Each customer is assigned a Program Manager who works directly with the customer on any customer service issues.

**(11) Information concerning how the applicant plans to bill and collect charges from customers:**

Applicant will bill customers directly on a monthly basis in arrears. All billing statements will list the Applicant's name, address, and customer service toll free telephone number for customer inquiries or concerns.

**(12) Information concerning the applicant's policies related to solicitation of new customers and description of the efforts the applicant shall use to prevent the unauthorized switching of interexchange carriers:**

Applicant will provide its services through a contract with the customer. Changes in rates, terms, or conditions will be governed by the underlying contract. Intrado Communications will comply with any applicable state and federal rules concerning the switching of interexchange carriers.

**(13) Information concerning how the applicant will make available to any person information concerning the applicant's current rates, terms, and conditions for all of its telecommunications services:**

Applicant's current rates, terms and conditions will be posted at:  
<http://www.tariffs.net/intradocommunications/states.asp>

**(14) Information concerning how the applicant will notify a customer of any materially adverse change to any rate, term, or condition of any telecommunications service being provided to the customer. The notification must be made at least thirty days in advance of the change:**

Applicant will provide its services through a contract with the customer. Changes in rates, terms, or conditions will be governed by the underlying contract.

**(15) A list of the states in which the applicant is registered or certified to provide telecommunications services, whether the applicant has ever been denied registration or certification in any state and the reasons for any such denial, a statement as to whether or not the applicant is in good standing with the appropriate regulatory agency in the states where it is registered or certified, and a detailed explanation of why the applicant is not in good standing in a given state, if**

**applicable:**

Intrado Communications is in good standing with the appropriate regulatory agency in the states where it is registered or certified. Applicant is certified to provide telecommunications services in the following states: AL, AR, AZ, CA, CO, CT, DE, DC, FL, GA, HI, ID, IN, IL, KS, KY, LA, MD, MA, MI, MN, MS, MO, MT, NC, ND, NE, NV, NM, NY, OH, OK, OR, PA, RI, SC, TN, TX, UT, VT, VA (through its subsidiary, Intrado Communications of Virginia Inc.), WA, WV, WI, and WY.

Applicant was denied registration/certification in New Hampshire and Iowa. On March 14, 2001, the New Hampshire Public Utilities Commission denied SCC Communications (now Intrado Communications Inc.) application for a certificate of public convenience and necessity (CPCN) without prejudice. The application was denied after the New Hampshire PUC determined the services Applicant proposed to offer (aggregation and transport of 9-1-1 emergency call) did not require a CPCN under New Hampshire PUC Rule 1306.01. Similarly, on March 15, 2002, the Iowa Utilities Board denied without prejudice an application for CPCN filed by Intrado Communications Inc. for the same reason under to Iowa Code § 476.29.

- (16) A description of how the applicant intends to market its services, its target market, whether the applicant engages in any multilevel marketing, and copies of any company brochures used to assist in the sale of services:**

Applicant will market its services through its direct sales force. Applicant will not engage in multilevel marketing.

Attached hereto as Exhibit E is a company brochure that is used to assist in the sale of services, i.e., A9-1-1 Routing.

- (17) Federal tax identification number and South Dakota sales tax number:**

Applicant's Federal Tax ID Number is: 84-1597262

Applicant does not have a South Dakota sales tax number at this time. Applicant will obtain a South Dakota sales tax number prior to providing service.

- (18) The number and nature of complaints filed against the applicant with any state or federal commission regarding the unauthorized switching of a customer's telecommunications provider and the act of charging customers for services that have not been ordered:**

Applicant has not had any complaints filed against it regarding the unauthorized switching of a customer's telecommunications provider or for charging a customer for services that they had not ordered.

- (19) A written request for waiver of those rules the applicant believes to be inapplicable:**

Applicant is requesting a waiver of the requirement to provide financial statements as requested in 20:10:24:02(9). Applicant has provided a link to the audited financials of its parent company, West Corporation.

Applicant is requesting a waiver of the requirement to provide a South Dakota tax identification number as requested in 20:10:24:02(17) as part of its application. Applicant will obtain a South Dakota sales tax number prior to providing service.

- (20) Other information requested by the commission needed to demonstrate that the applicant has sufficient technical, financial, and managerial capabilities to provide the interexchange services it intends to offer consistent with the requirements of this chapter and other applicable rules and laws.**

Applicant has no additional information it believes is relevant to Applicant's qualifications to provide the proposed service.

**WHEREFORE**, Intrado Communications Inc., respectfully requests that the South Dakota Public Utilities Commission enter an order granting this Application, and such other relief as may be just and proper.

Respectfully Submitted,

Intrado Communications Inc.

/s/ Mary Jane Rasher

Mary Jane Rasher

Director, Regulatory & Government Affairs

Intrado

1601 Dry Creek Drive

Longmont, Colorado 80503

Tel: 720 494-5849

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