

319 South Coteau Street P.O. Box 280 Pierre, SD 57501

> Phone: 605-224-5825 Fax: 605-224-7102 www.riterlaw.com

August 29, 2014

Ms. Patricia Van Gerpen SD Public Utilities Commission 500 E. Capitol Ave. Pierre, SD 57501

Re: Informational Filing-Request by RC Communications, Inc.

Dear Ms. Van Gerpen:

For informational purposes only, please find attached correspondence sent on behalf of RC Communications, Inc. to Sprint Corporation requesting interconnection pursuant to Section 251(a) and 252(b)(1) of the Communications Act of 1934, as amended, and Section 20.11(e) of the FCC's rules. While I do not believe that ARSD 20:10:32:20 requires this notification when the requesting telecommunications company is a local exchange carrier, we submit this informational filing nonetheless to apprise the Commission of the request.

If you have any questions, please contact me.

Very truly yours,

RITER, ROGERS, WATTIER & NORTHRUP, LLP

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Darla Pollman Rogers

DPR-cd Enclosures

Cc: Scott Bostrom

Robert C. Riter, Jr Margo D. Northrup

Darla Pollman Rogers Lindsey Riter-Rapp Jerry L. Wattier Robert D. Hofer, Of Counsel



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Certified and Regular Mail

Sprint Corporation Charles R. Wunsch Senior Vice President – General Counsel 6200 Sprint Parkway Overland Park, Kansas 66251

Dear Mr. Wunsch:

By this letter, RC Communications, Inc., 205 Main Street, P. O. Box 196, New Effington, South Dakota 57255 ("RC Communications") requests the negotiation of a wireless interconnection agreement with Sprint Corporation and its wireless subsidiaries and/or affiliates (Sprint), pursuant to Section 251(a) and 251(b) and 252(b)(1) of the Communications Act of 1934, as amended and section 20.11(e) of the FCC's rules. Among other things, the interconnection agreement will establish the physical and financial point of interconnection between the parties for the exchange of wireless traffic, in accordance with Section 251(b)(5). Based on the specific point of interconnection established between the parties, obligations relating to the arrangement of necessary transport services and the payment of transport compensation can then be determined.

For purposes of the interconnection negotiation, RC Communications requests that Sprint provide the Call Detail Records (CDRs) referenced in the May 30, 2014, letter from Mr. Kevin A. Bearden, Manager Access Verification, of Sprint Communications Company, L.P., and a subsidiary of Sprint. According to Mr. Bearden's letter, Sprint reviewed CDRs for traffic exchanged between the companies and identified intraMTA wireless traffic, both originating and terminating and both interstate and intrastate, for which Sprint alleges access charges were improperly billed. RC Communications requests that Sprint provide the CDRs in Exchange Message Interface (EMI) format, in compliance with ATIS standards, that include the Originating Operating Carrier Number (OCN) and the Jurisdiction Information Parameter (JIP) that should be populated in the Originating Local Routing Number (LRN) field of the EMI CDRs. In addition, Mr. Bearden's letter provides a separate factor for originating interstate and intrastate traffic measured for a recent one-month period." RC Communications requests that Sprint alleges is based on "actual traffic measured for a recent one-month period." RC Communications requests that Sprint identify the specific CDRs used to establish these factors.

Robert C. Riter, Jr Margo D. Northrup Darla Pollman Rogers Lindsey Riter-Rapp Jerry L. Wattier Robert D. Hofer, Of Counsel



Mr. Charles R. Wunsch August 29, 2014 Page 2

RC Communications requests that Sprint identify the person responsible for negotiating a wireless interconnection agreement on Sprint's behalf within 10 days of the date of this letter. Please contact me at (605) 224-7889 and <u>dprogers@riterlaw.com</u> with this information.

Sincerely,

RITER, ROGERS, WATTIER, & NORTHRUP, LLP

By:

Stiria Poliman Rogers

Darla Pollman Rogers Attorney for RC Communications, Inc.

Cc: Kevin A. Bearden Scott Bostrom