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August 29, 2014

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

Re: Informational Filing-Request by Venture Communications Cooperative, and
Western Telephone Company

Dear Ms. Van Gerpen:

For informational purposes only, please find attached correspondence sent on behalf of Venture Communications Cooperative and Western Telephone Company 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

By: *Darla Pollman Rogers*

Darla Pollman Rogers

DPR-cd
Enclosures

Cc: Randy Houdek

Robert C. Riter, Jr
Margo D. Northrup

Darla Pollman Rogers
Lindsey Riter-Rapp

Jerry L. Wattier
Robert D. Hofer, Of Counsel

August 29, 2014

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, Venture Communications Cooperative, on behalf of itself and its subsidiary, Western Telephone Company, 218 Commercial Ave. SE, Highmore, South Dakota 57346 (“Venture”) 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 negotiations, Venture 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, to Venture Communications Cooperative.¹ 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. Venture 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 and terminating interstate and intrastate traffic that Sprint alleges is based on “actual traffic measured for a recent one-month period.” Venture requests that Sprint identify the specific CDRs used to establish these factors.

¹ Western Telephone Company did not receive a similar letter from Mr. Bearden.



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Venture 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 dprogers@riterlaw.com with this information.

Sincerely,

RITER, ROGERS, WATTIER,
& NORTHRUP, LLP

By: 

Darla Pollman Rogers
Attorney for Venture Communications Cooperative and
Western Telephone Company, its subsidiary

Cc: Kevin A. Bearden
Randy Houdek