
BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA

SOUTH DAKOTA NETWORK, LLC'S,
APPLICATION FOR WAIVER OF
SWITCHED ACCESS COST STUDY

Docket No. TC-_____

APPLICATION FOR WAIVER OF
SWITCHED ACCESS COST STUDY

South Dakota Network, LLC (“SDN”) respectfully requests that the South Dakota Public Utilities Commission (“Commission”) grant a waiver, pursuant to ARSD § 20:10:27:02, of the requirement to perform a switched access cost study. SDN makes this Application based on the following:

1. ARSD § 20:10:27:07 requires a carrier’s carrier to file cost data in support of its switched access service tariff no less than once every three years. ARSD § 20:10:27:02 provides that the Commission may, for good cause shown, either by its own motion or by application from a carrier’s carrier, temporarily waive or suspend any rule in chapter 20:10:27. SDN notes that the Commission has in the past granted such waivers to SDN and other carriers.

2. The Commission approved SDN’s 2001 intrastate switched access rates on October 23, 2003, in Docket TC02-091, after a thorough review of the cost study filed by SDN in that docket. In May of 2005 and April of 2008, SDN applied for a waiver from the requirement to file a cost study, which applications were granted by this Commission. (See Dockets TC05-062 and TC08-037).

3. On June 7, 2011 SDN filed an Application for Waiver of Switched Access Cost Study. (TC11-069). Sprint Communications Company LP (“Sprint”), AT&T Communications of the

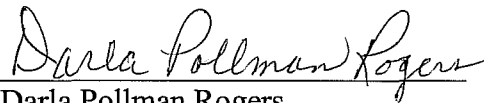
Midwest, INC. ("AT&T"), and MCI Communications Services Inc. d/b/a Verizon Business Services ("MCI") were granted intervention. On September 20, 2013 an Order was approved by the Commission granting Sprint's Motion to Withdraw from the docket. This is the last activity in this docket. SDN respectfully requests that the Commission grant the waiver requested in docket TC11-069 and close the docket.

4. SDN further requests a waiver from filing a cost study in 2014, for the following reasons:

- (1) Preliminary analysis indicates that a cost study would support higher rates;
- (2) Producing such a study is costly and consumes a great deal of time and resources. SDN does not have the internal experts necessary to determine cost-based intrastate access rates and would have to employ the services of outside consultants. This additional expense would not result in any meaningful benefits to consumers of SDN's services; and
- (3) SDN does not anticipate raising access rates at this time.

WHEREFORE, SDN requests the Commission temporarily waive or suspend the requirement in ARSD § 20:10:27:07 for the current period, based on the good cause recited above.

DATED this 30th day of June, 2014.


Darla Pollman Rogers
Margo D. Northrup
PO Box 280
Pierre, SD 57501
Telephone (605) 227-7889
Fax (605) 224-7102
Attorneys for SDN