

510 Broadway ~ P.O. Box 136 Abercrombie, ND 58001

May 30, 2018

Patricia Van Gerpen, Executive Director South Dakota Public Utilities Commission 500 East Capital Avenue Pierre, SD 57501

RE: Red River Rural Telephone Association, dba Red River Communications, South Dakota Annual ETC Certification Filing Waiver

Dear Ms. Van Gerpen:

Red River Rural Telephone Association, dba Red River Communications (Red River) respectfully requests a waiver of the Commission's filing requirements under ARSD 20:10:32:56 of the Commission rules. Red River currently has one voice subscriber in the South Lidgerwood exchange and finds the ETC certification process in South Dakota to be unduly burdensome and unnecessary for one customer. Red River files annually with the North Dakota Public Service Commission and the Minnesota Public Utilities Commission for ETC Certification and believes their review and approval of Red River's ETC filing for the majority of subscribers should be sufficient.

As the General Manager of Red River, I affirm Red River utilized the universal service funds received in 2017 and will spend the 2019 funds for the provision, maintenance and upgrading of facilities and services for which such support is intended. However, Red River previously deployed fiber to the customer in South Dakota so not much funding will be spent directly on this one customer but rather for the equipment provisioned to provide service to our entire study area.

Red River was previously designated an Eligible Telecommunications Carrier (ETC) by the Commission in the past and requests the Commission include Red River in its certification to the Universal Service Administrative Company and the Federal Communications Commission based on this request.

If you have any questions in reference to this filing, please contact Marlene Bennett at Consortia Consulting, mbennett@consortiaconsulting.com.

Sincerely,

Red River Rural Telephone Association

**Enclosures** 

CC: Marlene Bennett, Consortia Consulting