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SOUTH DAKOTA PUBLIC
UTILITIES COMMISSION

April 10, 2020

VIA ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
Washington, D.C. 20554

Attention: Wireline Competition Bureau

**RE: Notification of Discontinuance of Common-Carriage Tariffed Wireline
Broadband Internet Access Service ("WBIAS") and Initiation of Provision on
a Permissive Detariffed Common-Carriage Basis by:**

**Interstate Telecommunications Cooperative, Inc.
FCC Registration Number 0003741550
Study Area Code 391654
Study Area Code 361654**

CC Docket No. 02-33

Dear Ms. Dortch:

John Staurulakis, Inc. (JSI), on behalf of Interstate Telecommunications Cooperative, Inc. (Company), an issuing carrier for NECA Tariff F.C.C. No. 5, respectfully files the attached notice pursuant to the *Wireline Broadband Order* of the intent of the Company to discontinue its Wireline Broadband Internet Access Service (WBIAS) offerings under NECA Tariff F.C.C. No. 5 effective July 1, 2020. Upon discontinuance of the tariffed offerings, the Company will provide WBIAS on a common-carriage non-tariffed basis. See *Appropriate Framework for Broadband Access to the Internet over Wireline Facilities, Universal Service Obligations of Broadband Providers*, CC Docket No. 02-33, WC Docket No. 05-271, Report and Order and Notice of Proposed Rulemaking, 20 FCC Rcd 14853 (2005), FCC 05-150 (Rel. Sept. 23, 2005), (*Wireline Broadband Order*).

Echelon Building II, Suite 200
9430 Research Blvd., Austin, TX 78759
phone: 512-338-0473, fax: 512-346-0822

Eagandale Corporate Center, Suite 310
1380 Corporate Center Curve, Eagan, MN 55121
phone: 651-452-2660, fax: 651-452-1909

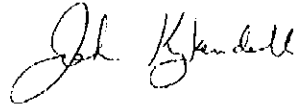
3440 Blue Springs Road, NW, Suite 503
Kennesaw, GA 30144
phone: 770-569-2105, fax: 770-410-1608

547 South Oakview Lane
Bountiful, UT 84010
phone: 801-294-4576, fax: 801-294-5124

Telecommunications Advisors Since 1962

Any questions regarding the notice may be directed to me at the address and telephone number listed above or by email at jkuykendall@jsitel.com.

Sincerely,



John Kuykendall
Vice President

Attachment

cc: Interstate Telecommunications Cooperative, Inc.
Special Assistant for Telecommunications at the Department of Defense
The Office of the Honorable Kristi Noem, Governor of South Dakota
The Office of the Honorable Tim Walz, Governor of Minnesota
South Dakota Public Utilities Commission
Minnesota Public Utilities Commission
National Exchange Carrier Association

**Notice of Permissive Detariffing of Wireline Broadband Internet Access Service
Effective July 1, 2020 by**

INTERSTATE TELECOMMUNICATIONS COOPERATIVE, INC. - SAC 391654, 361654

312 4th Street W
P.O. Box 920
Clear Lake, SD 57226
(605) 874-2181

CC Docket No. 02-33

Interstate Telecommunications Cooperative, Inc. (“Company”) hereby provides notice that it plans to terminate provision of wireline broadband Internet access service (WBIAS) on a tariffed basis effective July 1, 2020 at which time it plans to offer permissive detariffed WBIAS on a Title II common-carriage basis pursuant to paragraph 94 of the Federal Communications Commission’s *Wireline Broadband Order*.¹ The Company currently offers WBIAS through Asymmetric and Symmetric Digital Subscriber Line Access Service (“ADSL” and “SDSL”, respectively) and Consumer Broadband-Only Loop (“CBOL”) under National Exchange Carrier Association (“NECA”) Tariff F.C.C. No. 5, for which the Company is an issuing carrier.

The Company has requested of NECA that it remove the Company as a carrier listed in NECA Tariff F.C.C. No. 5 as a provider of ADSL and SDSL Access Services, and CBOL (hereinafter “WBIAS”) under the tariff effective July 1, 2020.

Impact on Customers

The only customer for the Company’s WBIAS is the Company’s affiliate nonregulated Internet Service Provider (“ISP”) operation. The affiliate purchases WBIAS for use as a component in its broadband Internet service sold to consumers and business customers. The discontinuance of the tariffed offering of WBIAS will have no effect on the end user service provided by the affiliate.

Serving Area

The company’s provision of WBIAS is limited to its ILEC serving areas in South Dakota and Minnesota.

Future Availability of WBIAS on a Permissive-Detariffed Common Carriage Basis

The Company will continue to make WBIAS available on a common-carriage basis through posting of rates, terms and conditions on its Internet website in a manner similar to that required for interstate and international interexchange services under Section 42.10 of the FCC’s rules (47 C.F.R. § 42.10).

¹ See *Appropriate Framework for Broadband Access to the Internet over Wireline Facilities, Universal Service Obligations of Broadband Providers*, CC Docket No. 02-33, WC Docket No. 05-271, Report and Order and Notice of Proposed Rulemaking, 20 FCC Rcd 14853 (2005), FCC 05-150 (Rel. Sept. 23, 2005), (*Wireline Broadband Order*).

INTERSTATE TELECOMMUNICATIONS COOPERATIVE, INC.

312 4th Street W
P.O. Box 920
Clear Lake, SD 57226
(605) 874-2181

WBIAS DETARIFFING TIMELINE

April 10, 2020

30-Day Notice filed with following:

Federal Communications Commission (under CC Docket No. 02-33)
Special Assistant for Telecommunications at the Department of Defense
The Office of the Honorable Kristi Noem, Governor of South Dakota
The Office of the Honorable Tim Walz, Governor of Minnesota
South Dakota Public Utilities Commission
Minnesota Public Utilities Commission
National Exchange Carrier Association

April 10, 2020

Notice to customers.

As indicated above, the only customer for the Company's wireline broadband Internet Access Service (WBIAS) is the Company's affiliate nonregulated ISP operation. The 30-day notice to the affiliate ISP will be provided by interoffice memorandum cover with this notice attached.

June 16, 2020

Expected filing by NECA on 15-day notice of a tariff transmittal that will include, *inter alia*, removal of Interstate Telecommunications Cooperative, Inc. from the list of issuing carriers offering ADSL and SDSL Access Service, and CBOL.

July 1, 2020

Planned NECA tariff filing to become effective. Beginning on this date the Company no longer offers WBIAS under NECA Tariff F.C.C. No. 5.

July 1, 2020 Forward

WBIAS available on common-carriage non-tariffed basis under rates, terms and conditions posted at www.itc-web.com.

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Notification of Discontinuance of Common Carrier Tariffed Wireline Broadband Internet Access Service was served this 10 day of April, 2020, by mailing true and correct copies thereof, postage prepaid, to the following persons:

Secretary of Defense
Attn: Special Assistant for Telecommunications
1000 Defense Pentagon
Washington, D.C. 20301-1000

The Honorable Kristi Noem
Office of Governor
State of South Dakota
500 East Capitol Avenue
Pierre, South Dakota 57501

The Honorable Tim Walz
Office of the Governor
130 State Capitol
75 Rev D. Martin Luther King Jr. Blvd.
St. Paul, MN 55155

South Dakota Public Utilities Commission
Capitol Building, 1st Floor
500 E. Capitol Ave.
Pierre, South Dakota 57501-5070

Minnesota Public Utilities Commission
121 7th Place E, Suite 350
St. Paul, MN 55101-2147

National Exchange Carrier Association
60 Columbia Road
Building A – 2nd Floor
Morristown, New Jersey 07960

/s/ Marty Klueh
