

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA**

IN THE MATTER OF THE PETITION BY)	
NORTH AMERICAN LOCAL LLC FOR)	
RECLASSIFICATION AS A FACILITIES BASED)	TC23-046
ELIGIBLE TELECOMMUNICATIONS CARRIER)	
)	

SDTA Petition to Intervene

The South Dakota Telecommunications Association ("SDTA") hereby petitions the Commission for intervention in the above captioned proceeding pursuant to SDCL 1-26-17.1 and ARSD §§ 20:10:01:15.02, 20:10:01:15.03 and 20:10:01:15.05. In support hereof, SDTA states as follows:

1. SDTA is an incorporated organization representing the interests of numerous cooperative, independent and municipal telephone companies operating throughout the State of South Dakota.

2. All SDTA member companies operate as "rural telephone companies" for purposes of the Federal Telecommunications Act of 1996 and also the state laws enacted in 1998 addressing local exchange competition (SDCL § 39-31-69, et. seq.).

3. On or about September 29, 2023, North American Local, LLC ("NAL") filed a Petition seeking Reclassification as a Facilities-Based Eligible Telecommunications Carrier

4. The Petition alleges, due to its build out, NAL is now a facilities-based provider and thus eligible for reclassification as such to provide Lifeline services.

5. SDTA member local exchange carriers have an interest in and stand to be impacted by this proceeding. All the SDTA member companies operate as "rural telephone companies" and "eligible telecommunications carriers" under the Federal Telecommunications Act of 1996 and under applicable state laws. SDTA, therefore, seeks intervention in this proceeding based on

the individual interests of each of its affected member companies and their common interests in ensuring that all federal and state requirements pertaining to ETC designation, including the additional public interest protections afforded rural telephone company service areas, are properly considered and applied.

6. SDTA is an interested party in this matter and seeks intervening party status.

Dated this 2 day of October 2023.

Respectfully submitted:

/s/ Kara Semmler
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