



South Dakota Telecommunications Association

Advocating for South Dakota's Rural Broadband Providers

March 29, 2018

Ms. Patty Van Gerpen, Executive Director  
South Dakota Public Utilities Commission  
500 East Capitol Ave.  
State Capitol Building  
Pierre, SD 57501

**RE: Docket AA18-001 - In the Matter of Clarification of the Commission's  
ETC Certification Process**

Dear Ms. Van Gerpen:

The South Dakota Telecommunications Association (SDTA) files this letter in the above referenced docket to support the request of Commission Staff asking for clarification from the Commission as to what requirements should apply to this year's annual ETC certification filings relating to ETC use of federal high cost support dollars. The Commission has for a number of years provided waivers of some of its rule requirements based on a review of the applicable federal reporting requirements, appropriately recognizing the burdens that are imposed by either unnecessary or duplicative federal and state reporting requirements. SDTA believes a fresh review of the state ETC certification requirements is needed given the FCC's "Report and Order" released on July 7, 2017 (FCC17-87) which streamlined the federal annual reporting requirements for high-cost recipients by eliminating several of its ETC reporting obligations.<sup>1</sup> This review is also necessary given that the FCC is now substantially relying on its "High Cost Universal Broadband" ("HUBB") online reporting system to track broadband location information and related certifications.

SDTA has not yet had an opportunity to gather input from its member companies concerning the changes in the federal reporting obligations and how these changes should be accounted for in implementation of the related state rule requirements. As in past years, SDTA would request an opportunity to provide comments related to waivers of any provisions contained in ARSD §§ 20:10:32:52 and 20:10:32:54 at the time this matter is addressed at a Commission meeting.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard D. Coit", is written over the word "Sincerely,".

Richard D. Coit  
SDTA Executive Director and General Counsel

cc: Docket "Service List"

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<sup>1</sup> See "Report and Order" in WC Docket NO. 10-90 and WC Docket No. 14-58, In the Matter of Connect American Fund ETC Annual Reports and Certifications, FCC17-87, Released July 7, 2017, paragraphs 3-17 and revisions to 47 C.F.R. § 54.313.