K: HE TC99-030 30 DOCKET NO. -1-66 31 In the Matter of ____ IN THE MATTER OF THE FCC ORDER ESTABLISHING NEW DEADLINES FOR IMPLEMENTATION OF INTRALATA DIALING PARITY BY LOCAL EXCHAMGE CARRIERS Public Utilities Commission of the State of South Dakota DATE MEMORANDA ecclural Schelale; Winto tu len sai an lan; e Co.

5/7/99 Comments VSWest: Plen 3 Party Plan 40: rications intel mounts; 94 Recusio Disting Party Plan; 199 and OTI ninen Letters alexa Paritullari Natulialion setter; les ariti nest. laine Uskg Theating; lin; mm lbs ~, Pas an the 10 99 AT+T 's Request. 94 USU Poursel 94 caling christy Plan Venture Letter in Pasity Plazi Plan, Tarte Julina Setter; all Digling Parity Plan 99 in Party ation planci rity Plan; alins Parte 2/99 AT+T's lementer Dealing Parity Plan; 2/99 Firsta's amended Dealing Parity Plan, 2/99 Dacket Classed

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF SOUTH DAKOTA

IN THE MATTER OF THE FCC ORDER) OR ESTABLISHING NEW DEADLINES FOR) IMPLEMENTATION OF INTRALATA DIALING) PR PARITY BY LOCAL EXCHANGE CARRIERS)

ORDER OPENING DOCKET AND SETTING PROCEDURAL SCHEDULE TC99-030

On March 23, 1999, the Federal Communications Commission (FCC) issued an order establishing new deadlines for implementation of intraLATA dialing parity by local exchange carriers (LECs). In the Matters of Implementation of the Local Competition Provisions of the Telecommunications Act of 1996: Petition of Southwestern Bell Telephone Company, Pacific Bell, and Nevada Bell for Expedited Declaratory Ruling on Interstate IntraLATA Toll Dialing Parity or, in the Alternative, Various Other Relief, CC Docket No. 96-98, FCC 99-54 (released March 23, 1999). The order states that "[n]o later than April 22, 1999, all LECs must file intraLATA toll dialing parity plans with the state regulatory commission for each state in which the LEC provides telephone exchange service if a plan has not yet been filed with such state commission. Once a state commission has approved a plan, the LEC must implement its plan no later than 30 days after the date on which the plan is approved." Id at ¶ 7. If the state commission has not acted on the plan by June 22, 1999, the LEC must file the plan with the Common Carrier Bureau of the FCC. Id.

At its March 30, 1999, meeting, the Public Utilities Commission (Commission) considered how to proceed in this matter. The Commission has jurisdiction over this matter pursuant to SDCL 49-31-81 and the Federal Telecommunications Act of 1996, specifically 47 U.S.C. §§ 251 and 252. Parties represented at the Commission meeting either in person or via teleconference were as follows: U S WEST; SDITC; FirsTel; DTG; SDN; AT&T; and MCI. None of the parties objected to the Commission opening a docket in order to review intraLATA toll dialing plans. The Commission proposed establishing a procedural schedule that would allow other parties to file written comment on the LECs' intraLATA toll dialing plans. No parties objected to this proposal. The Commission voted unanimously to open a docket to review intraLATA toll dialing plans and to establish a procedural schedule for the filing of comments. The Commission sets the following schedule:

Pursuant to FCC order, LECs shall file an intraLATA toll dialing plan by April 22, 1999;

Interested persons or entities may file comments on the plans no later than May 7, 1999;

LECs may file rebuttal comments no later than May 17, 1999.

It is therefore

ORDERED, that the Commission opens this docket to review intraLATA toll dialing plans in accordance with the procedural schedule listed above.

Dated at Pierre, South Dakota, this 31st day of March, 1999.

CERTIFICATE OF SERVICE BY ORDER OF THE COMMISSION: The undersigned hereby certifies that this document has been served today upon all parties of record in this docket, as listed on the docket service list, by facaimile or by first class mail, in property addressed enyalopes, with charges prepaid thereon. Chairman 00 B a Da Commissioner 8 (OFFICIAL SEAL) LASKA SCHOENFEEDER, Commissioner

South Dakota Public Utilities Commission WEEKLY FILINGS For the Period of March 24, 1999 Urough March 31, 1999

If you need a complete copy of a filing faxed, overnight expressed, or mailed to you, please contact Delaine Kolbo within five business days of this filing. Phone: 605-773-3705 Fax: 605-773-3809

CONSUMER COMPLAINTS

CT99-002 In the Matter of the Complaint filed by Randy Kieffer, Sturgis, South Dakota, against U S WEST Communications Regarding Poor Service.

The Complainant claims that he and his neighbors have poor telecommunications service. The Complainant states that "The service we are receiving from U S West is a joke and U S West needs to get serious about providing service." The Complainant seeks the following relief: "PUC should fine them \$4000 a day." Staff Attorney: Camron Hoseck Consumer Affairs: Leni Healy Date Filed: 03/19/99

TELECOMMUNICATIONS

TC99-026 In the Matter of the Application to Transfer the Certificate of Authority from Black Hills Fibercom, Inc. to Black Hills FiberCom, L.L.C.

Black Hills Fibercom, Inc. has filed with the Public Utilities Commission an application to transfer its Certificate of Authority to Black Hills FiberCom, L.L.C. Black Hills Fibercom, Inc. was granted authority to provide interexchange telecommunications services statewide and local telecommunications services within U S WEST Communications service areas on August 5, 1998.

Staff Analyst: Harlan Best Staff Attorney: Karen Cremer Date Filed: 03/25/99 Intervention Deadline: 04/16/99

1

TC99-027 In the Matter of the Application of Concert Communications Sales LLC for a Certificate of Authority to Provide Telecommunications Services in South Dakota.

Concert Communications Sales LLC (CCS) has filed a request for a Certificate of Authority to operate as a reseller of intraLATA and interLATA interexchange telecommunications services throughout South Dakota. CCS intends to provide a full range of 1+ interexchange services and data transmission services, including, MTS, private line, WATS, post-paid calling card, prepaid calling card, toll free, ISDN and frame relay service products.

Staff Analyst: Michele Farris Staff Attorney: Camron Hoseck Date Filed: 03/29/99 Intervention Deadline: 04/16/99

TC99-028 In the Matter of the Application of Nor Communications, Inc. for a Certificate of Authority to Provide Telecommunications Services in South Dakota.

Nor Communications Inc. has filed a request for a Certificate of Authority to operate as a reseller of intrastate telecommunications services throughout South Dakota. Nor Communications intends to provide a full range of 1+ interexchange services, including, MTS, WATS, and calling cards.

Staff Analyst: Michele Farris Staff Attorney: Camron Hoseck Date Filed: 03/30/99 Intervention Deadline: 04/16/99

TC99-029 In the Matter of the Filing by Golden West Communications, Inc. for Approval of Boundary Change.

Vivian Telephone Co. d/b/a Golden West Communications received a request from a developer to change the Custer exchange boundary to bring all of the developer's territory into the Custer exchange. Presently part of the developer's territory is in the Hot Springs exchange served by Golden West Cooperative. Both the Cooperative board and Vivian's board have approved the boundary change.

Staff Analyst: Harlan Best Staff Attorney: Karen Cremer Date Filed: 03/30/99 Intervention Deadline: NA

TC99-030 In the Matter of the FCC Order Establishing New Deadlines for Implementation of IntraLATA Dialing Parity by Local Exchange Carriers

The Federal Communications Commission (FCC) order states that no later than April 22, 1999, all Local Exchange Companies (LECs) must file intraLATA toll dialing parity plans with the state regulatory commission for each state in which the LEC provides telephone exchange service if a plan has not yet been filed with such state commission. Once a state commission has approved a plan, the LEC must implement its plan no later than 30 days after the date on which the plan is approved. If the state commission has not acted on the plan by June 22, 1999, the LEC must file the plan with the Common Carrier Bureau of the FCC. Pursuant to the FCC order, LECs shall file an intraLATA toll dialing plan by April 22, 1999; interested persons or entities may file comments on the plans no later than May 7, 1999; and LECs may file rebuttal comments no later than May 17, 1999.

Staff Analyst: Harlan Best Staff Attorney: Karen Cremer Docket Opened: 03/31/99 Intervention Deadline: NA

You may receive this listing and other PUC publications via our website or via internet e-mail. You may subscribe or unsubscribe to the PUC mailing lists at http://www.state.sd.us/puc/

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF SOUTH DAKOTA

IN THE MATTER OF THE FCC ORDER) ORDER SETTING ESTABLISHING NEW DEADLINES FOR) GUIDELINES IMPLEMENTATION OF INTRALATA DIALING) PARITY BY LOCAL EXCHANGE CARRIERS) TC99-030

On March 23, 1999, the Federal Communications Commission (FCC) issued an order establishing new deadlines for implementation of intraLATA dialing parity by local exchange carriers (LECs). In the Matters of Implementation of the Local Competition Provisions of the Telecommunications Act of 1996; Petition of Southwestern Bell Telephone Company, Pacific Bell, and Nevada Bell for Expedited Declaratory Ruling on Interstate IntraLATA Toll Dialing Parity or, in the Alternative, Various Other Relief, CC Docket No. 96-98, FCC 99-54 (released March 23, 1999). The order states that "[n]o later than April 22, 1999, all LECs must file intraLATA toll dialing parity plans with the state regulatory commission for each state in which the LEC provides telephone exchange service if a plan has not yet been filed with such state commission. Once a state commission has approved a plan, the LEC must implement its plan no later than 30 days after the date on which the plan is approved." Id. at ¶ 7. If the state common Carrier Bureau of the FCC. Id.

At its March 30, 1999, meeting, the Public Utilities Commission (Commission) opened a docket in order to review intraLATA toll dialing plans and established a procedural schedule that would allow other parties to file written comment on the LECs' intraLATA toll dialing plans. No parties objected to this proposal.

At its April 1, 1999, meeting, the Commission considered whether to issue guidelines for LECs to follow when developing their intraLATA toll dialing plans. The Commission has jurisdiction over this matter pursuant to SDCL 49-31-81 and the Federal Telecommunications Act of 1996, specifically 47 U.S.C. §§ 251 and 252. After discussion, the Commission voted unanimously to require the plans to contain the following information:

 a description of how the LEC will offer dialing parity for each exchange and its proposed time schedule;

2) a proposal for timely notification of its subscribers and the methods it proposes to use to enable subscribers to select an intraLATA toll provider, including the language the LEC proposes to use in its customer notification letter. The proposals shall include notification to current customers and new customers who join the network after the implementation of dialing parity; a LEC that is not a BOC must identify the LATA with which it will associate for the purposes of providing intraLATA and interLATA toll dialing parity;

 a description of how carriers will be informed of the implementation process and schedule and how carriers may participate in the process; and

a description of how the LEC's business office will handle requests to change carriers.

On the issue of cost recovery, the Commission decided that if a LEC believes that it needs cost recovery, the LEC should file for cost recovery in a separate proceeding before the Commission in accordance with FCC rules.

It is therefore

ORDERED, that the Commission adopts the above-listed guidelines for intraLATA dialing parity plans and instructs LECs that believe they need cost recovery to file for cost recovery in a separate proceeding.

Dated at Pierre, South Dakota, this 2nd day of April, 1999.

CERTIFICATE OF SERVICE The undersigned hereby certifies that this document has been served today upon all parties of record in this docket, as listed on the docket service list, by facsimile or by first class mail, in properly addressed eavelopes, with charges prepaid thereon. (OFFICIAL SEAL)

BY ORDER OF THE COMMISSION:

TAMES A. BURG, Chairman PAM NELSON, Commissioner

Ul.

LASKA SC HOENFELDER, Commissioner

2



RECEIVED

APR 7 0 1999

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

April 19, 1999

Mr. William Bullard, Executive Director South Dakota Public Utilities Commission 500 East Capitol Pierre, SD 57501

Dear Mr. Bullard:

In accordance with the FCC order TC99-030, enclosed is the original plus ten copies of the Heartland Telecommunications Company of Iowa IntraLATA Dialing Parity Plar. This plan will impact approximately 250 customers in adjacent portions of exchanges in Iowa, specifically West Hawarden and West Akron, South Dakota.

In order to implement this plan within thirty days of the Board's approval, I respectfully request this plan to be approved on June 22, 1999. This time will allow Heartland to finalize the carrier and end user notification plans.

Please call me at (507) 387-1728 with any questions.

Sincerely,

Patrice Burt

Patricia Burt Tariff Analyst Heartland Telecommunications Company of Iowa

Enclosure

221 E. HICKORY ST. P.O. BOX 3248 MANKATO, MN 56002-3248

1-800-792-4488 FAX 507-387-6778

Heartland Telecommunications of Iowa IntraLATA Equal Access Plan

Project Overview

Per FCC Order in Docket No. 96-98, released March 23, 1999, Heartland Telecommunications Company of Iowa has been directed to implement 1+ IntraLATA presubscription for its customers in the Sioux City LATA 630 and the DesMoines LATA 632. Heartland Telecommunications Company of Iowa serves the exchanges of Akron, Boyden, Doon, Hawarden, Hull, Ireton, Rock Rapids, Rock Valley and Sibley in the Sioux City LATA 630 and Lakota and Bancroft exchanges in the DesMoines LATA 632. When implemented, end users will have the opportunity to select a Carrier for their IntraLATA toll in the same manner as they currently select their InterLATA toll Carrier.

Heartland Telecommunications Company of Iowa's internal systems will carry two PICs on every account; one for InterLATA toll and the second for IntraLATA toll.

Customer service types included in this project are residence, business, and coin.

Heartland is currently the designated LATA toll provider for its customers.

1+ Network Routing

In the 1+ IntraLATA environment, when the end user places a 1+ IntraLATA toll call (using a Carrier other than Heartland Telecommunications Company of Iowa), it will be handled as 1+ InterLATA calls are handled today. The call will be routed to one of the selected Carrier's Points of Presence (POP) within the LATA and then will go over the Carrier's Feature Group D (FGD) Switched Access Service Trunks. The same routing occurs today when end users place IntraLATA calls using 101XXXX access.

The Carrier will continue to pay originating and terminating intrastate switched access charges where applicable.

Operator Service (0+ and 0-) and Directory Assistance (DA) Routing

0+ IntraLATA calls will be routed to the end user's Carrier of choice. When the end user dials 0+, the switch will determine their primary IntraLATA Carrier (PIC) and route the call accordingly. Heartland Telecommunications Company of Iowa's switches have been upgraded to accommodate this change.

Heartland Telecommunications Company of Iowa will continu to provide IntraLATA 0- and Directory Assistance. End users dialing 0- are advised that Hea.tland Telecommunications Company of Iowa is handling their call.

Network and System Requirements

1

Heartland Telecommunications Company of Iowa has upg_ided software and operator office switches and will make changes to systems and processes to accommodate 1+/0+ IntraLATA service.

Regional Subscription System

PIC Selection

At implementation, Heartland Telecommunications Company of Iowa will continue to provide 1+ IntraLATA until the Customer or Carrier initiates a change. Carrier initiated PIC changes, whether InterLATA and/or IntraLATA, will be processed via the normal service change procedures. This would involve calling the Heartland Telecommunications of Iowa's Customer Care Center at 1-800-792-4486.

Conversion Status

During the conversion, Heartland Telecommunications Company of Iowa will provide, through their normal toll free number, status information for Customers or Carriers. The Customer Care Center will provide processing updates and status.

The number for the Customer Care Center is 1+800 792-4486.

Jurisdictional Indicator

Heartland Telecommunications Company of Iowa supports the three OBF recommended Jurisdictional Indicators (JIs).

JI	Definition	
В	IntraLATA Service/InterLATA Service (assumed international)	
A	IntraLATA Service	
E	InterLATA Service	

- If a Carrier submits a request with a JI of B, Heartland Telecommunications Company of Iowa
 will apply the requested PIC to both the IntraLATA and InterLATA service.
- If a Carrier submits a request with a JI of A, Heartland Telecommunications Company of Iowa
 will apply the requested PIC to the IntraLATA service.
- If a Carrier submits a request with a JI of E, Heartland Telecommunications Company of Iowa
 will apply the requested PIC to the InterLATA service.

Coin

Heartland Telecommunications Company of Iowa will select the primary Carrier for IntraLATA toll access on Heartland Telecommunications Company of Iowa public pay telephone accounts. For subscription of semi-public pay telephones, premises owners will select and designate the primary Carrier for IntraLATA toll access.

For subscription of Customer Owned Coin Operated Telephones (COCOT), the COCOT owner will select and designate the primary Carrier for IntraLATA toll access.

PIC Freeze

Heartland Telecommunications Company of Iowa currently applies a customer initiated freeze request to a Billing Account. At the time of conversion, all frozen Billing Accounts will continue to be frozen at the InterLATA level. On July 22, 1999, all frozen numbers will be frozen at the InterLATA and IntraLATA levels.

IntraLATA PIC changes on frozen accounts are accomplished by:

- The end user calling into the Heartland Telecommunications Company of Iowa's Customer Care Centers to have a PIC change order issued.
- The Carrier contacting the Customer Care Center with the end user on-line to have a PIC change order issued.

Test Numbers

The following numbers can be used to validate the PIC for a line. The call to the test number must be made from the line being tested. A recording will then tell the caller who the Carrier is for the selected jurisdiction.

InterLATA Test Number

1+700 555-4141

IntraLATA Test Number

1+(home NPA) 700-4141

Customer Care Center Procedures

New Service

When an end user customer contacts Heartland Telecommunications Company of Iowa to place an order for new service, the local service needs will be addressed first. The customer will then be asked to select an IntraLATA toll Carrier. If the end user is und cided as to what Carrier to select, a list of participating Carriers will be read to them.

The end user must select both an IntraLATA and InterLATA provider. The IntraLATA PIC will be negotiated first, the InterLATA, second. After the Carrier selection is made, the service order will be issued to establish service. Heartland Telecommunications Company of Iowa has upgrided software and operator office switches and will make changes to systems and processes to accommodate 1+/0+ IntraLATA service.

Regional Subscription System

PIC Selection

At implementation, Heartland Telecommunications Company of Iowa will continue to provide 1+ IntraLATA until the Customer or Carrier initiates a change. Carrier initiated PIC changes, whether InterLATA and/or IntraLATA, will be processed via the normal service change procedures. This would involve calling the Heartland Telecommunications of Iowa's Customer Care Center at 1-800-792-4486.

Conversion Status

During the conversion, Heartland Telecommunications Company of Iowa will provide, through their normal toll free number, status information for Customers or Carriers. The Customer Care Center will provide processing updates and status.

The number for the Customer Care Center is 1+800 7/2-4486.

Jurisdictional Indicator

Heartland Telecommunications Company of Iowa supports the three OBF recommended Jurisdictional Indicators (JIs).

Л	Definition	
В	IntraLATA Service/InterLATA Service (assumed international)	
A	IntraLATA Service	
E	InterLATA Service	

- If a Carrier submits a request with a JI of B, Heartland Telecommunications Company of Iowa
 will apply the requested PIC to both the IntraLATA and InterLATA service.
- If a Carrier submits a request with a JI of A, Heartland Telecommunications Company of Iowa
 will apply the requested PIC to the IntraLATA service.
- If a Carrier submits a request with a JI of E, Heartland Telecommunications Company of Iowa
 will apply the requested PIC to the InterLATA service.

Coin

Heartland Telecommunications Company of Iowa will select the primary Carrier for IntraLATA toll access on Heartland Telecommunications Company of Iowa public pay telephone accounts. For subscription of semi-public pay telephones, premises owners will select and designate the primary Carrier for IntraLATA toll access.

For subscription of Customer Owned Coin Operated Telephones (COCOT), the COCOT owner will select and designate the primary Carrier for IntraLATA toll access.

PIC Freeze

Heartland Telecommunications Company of Iowa currently applies a customer initiated freeze request to a Billing Account. At the time of conversion, all frozen Billing Accounts will continue to be frozen at the InterLATA level. On July 22, 1999, all frozen numbers will be frozen at the InterLATA and IntraLATA levels.

IntraLATA PIC changes on frozen accounts are accomplished by:

- The end user calling into the Heartland Telecommunications Company of Iowa's Customer Care Centers to have a PIC change order issued.
- The Carrier contacting the Customer Care Center with the end user on-line to have a PIC change order issued.

Test Numbers

The following numbers can be used to validate the PIC for a line. The call to the test number must be made from the line being tested. A recording will then tell the caller who the Carrier is for the selected jurisdiction.

InterLATA Test Number

1+700 555-4141

IntraLATA Test Number

1+(home NPA) 700-4141

Customer Care Center Procedures

New Service

When an end user customer contacts Heartland Telecommunications Company of Iowa to place an order for new service, the local service needs will be addressed first. The customer will then be asked to select an IntraLATA toll Carrier. If the end user is und cided as to what Carrier to select, a list of participating Carriers will be read to them.

The end user must select both an IntraLATA and InterLATA provider. The IntraLATA PIC will be negotiated first, the InterLATA, second. After the Carrier selection is made, the service order will be issued to establish service. Heartland Telecommunications Company of Iowa will accept and process all IntraLATA selections regardless of the IntraLATA Carrier chosen.

There are 4 distinct lists of the Carriers that provide service in the Heartland area. The lists are rotated and varied in reading to provide random listings in each reading.

Transfer of Service

Currently, when Heartland Telecommunications Company of Iowa negotiates a Transfer of Service (To and From order), Customer Care personnel ask if the end user wishes to retain the same InterLATA PIC at the new location as they had at the old location.

With the implementation of IntraLATA service, Customer Care personnel will also confirm whether the end user wishes to retain the same IntraLATA Carrier at the new location as they had at the old location.

After confirmation of the IntraLATA Carrier, confirmation of the InterLATA selection will be made.

Collection and Treatment

Current collection and treatment practices do not change with the implementation of IntraLATA equal access.

Heartland Telecommunications Company of Iowa Policy/Ethical Business Practices

Customer contact personnel can at no time utilize the call detail of an Interexchange Carrier to market or promote Heartland Telecommunications Company of Iowa's products or services.

Heartland Telecommunications Company of Iowa understands the need for ethical handling of accounts. All Customer Care personnel are trained to handle business in an ethical manner. Heartland Telecommunications Company of Iowa uses quality measurements continually to ensure end users and Carriers are handled fairly and correctly.

Billing and Collections

Bill Appearance

Same Carrier for IntraLATA and InterLATA toll

If the same Carrier is selected by the end user as their IntraLATA and InterLATA Carrier of choice, toll for both will be interspersed on the same page of the bill. The bill page will not be separated by InterLATA or IntraLATA toll.

If different Carriers are selected by the end user as their IntraLATA and InterLATA Carrier of choice, and the chosen Carrier has a billing agreement with Heartland Telecommunications Company of Iowa to do toll billing on their behalf, the toll will be separated by jurisdiction by Carrier.

Same Carriers for IntraLATA and InterLATA toll

The Heartland Telecommunications Company of Iowa bill pages will be sorted in the order listed below:

- Heartland Telecommunications Company of Iowa summary pages
- IntraLATA/InterLATA PIC Carrier bill page
- 900 Carrier bill page
- Casual Carrier bill page

Different Carriers for IntraLATA and InterLATA toll

The Heartland Telecommunications Company of Iowa bill pages will be sorted in the order listed below:

- Heartland Telecommunications Company of Iowa summary pages
- IntraLATA PIC Carrier bill page
- InterLATA PIC Carrier bill page
- 900 Carrier bill page
- Casual Carrier bill page

PIC Change Charges

PIC change charges will appear in the Other Charges and Credits section on the bill page.

The following is an example of the how the charge will appear on the Other Charges and Credits (OC&C) page:

Long Dist Carrier Change \$XX.XX

If an end user has different IntraLATA and InterLATA Carriers and changes both at the same time, only one Long Distance Carrier Change charge is billed.

Implementation Schedule

Heartland Telecommunications Company of Iowa will submit their IntraLATA presubscription plan by April 22, 1999 to the Iowa Utility Board as ordered by the FCC.

Carrier Participation

Based on the order, Heartland Telecommunications Company of Iowa will provide a notification letter and participation form to all Carriers on May 17, 1999. Carriers interested in participating in 1+ IntraLATA presubscription must respond to Heartland Telecommunications Company of Iowa and provide required information by June 14, 1999.

Respondents will be placed on the end user notification in random and rotational order and no competing provider will be given advantage over another. Company names will be shown once for Carriers with multiple CIC codes.

Existing FGD

Existing Feature Group D Switched Access trunks accommodate both InterLATA and IntraLATA traffic. Carriers wishing to increase the number of their FGD trunks should follow the normal Access Service Request (ASR) process.

End User Notification

End users will be notified of their IntraLATA presubscription options starting July 22, 1999 as directed by the Iowa Utilities Board.

Customer Care Center Start Date

The Heartland Telecommunications Company of Iowa's Customer Care Center will accept IntraLATA PIC change orders beginning July 22, 1999.

The Heartland Telecommunications Company of Iowa's Customer Care Center will not recognize any IntraLATA PIC changes prior to the implementation date. Therefore, orders submitted prior to July 22, 1999 will be processed as an InterLATA PIC change.

Conversion Contact Number

During the conversion, Heartland Telecommunications Company of Iowa can be contacted on their toll free number for end users or Carriers to call.

The toll free number is 1-800-792-4486.

PIC Activity Charges

Heartland Telecommunications Company of Iowa filed an Intrastate tariff in Iowa for IntraLATA PIC change rates which mirror the rates currently approved in ICORE, Inc. Tariff F.C.C. No. 1.

Existing customers may make one selection of a primary IntraLATA Carrier without being assessed the IntraLATA PIC change charge through August 16, 1999.

Only the Tirst IntraLATA PIC change that passes the Heartland Telecommunications Company of Iowa order edits and is worked in the switch is counted as the PIC change for which the charge is waived. Subsequent PIC changes will be charged and billed accordingly.

Proposed IntraLATA Rates

The charges for an IntraLATA PIC change are as follows:

Per Telephone Exchange Service line/Trunk	\$ 5.00
Per Switched Access Lineside Connection	\$ 5.00
Per Centrex line	\$ 5.00
Per Pay Telephone line	\$ 5.00

PIC Dispute Rates

The charges for an unauthorized IntraLATA PIC change dispute are as follows:

\$ 35.65
\$ 35.65
\$ 35.65
\$ 57.57

If both the IntraLATA and InterLATA PICs are disputed at the same time, both the IntraLATA and InterLATA charge will apply.

electrical and telephone supplies and hardware



DAKOTA ELECTRIC SUPPLY COMPANY

FARGO (701) 237-0440 ND WATS 1-800-342-4936 MN, SD, MT, IA, NE, WY WATS 1-800-437-4702

BISMARCK (701) 222-2222 ND WATS 1-800-222-2334 SD & MT WATS 1-800-437-8082 GRAND FORKS (701) 746-7373 ND WATS 1-800-732-4204 MN WATS 1-800-633-2211

Mr. Bullard -

Enclosed is an ariginal and 10 copies of our "Implementation Plan for Intro - Lata Dealing Parity" for our accent Commissionti Here distribute as Thompso nicisso Clivity Honson, Mge accent Communication The



RECEIVED

April 19, 1999

APR 20 1999 SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

1

Bill Bullard, Executive Director South Dakota Public Utilities Commission State Capitol Building 500 East Capitol Ave Pierre, South Dakota 57501

RE: Docket TC99-030 (Implementation Plan for IntraLATA Dialing Parity)

Dear Bill:

Enclosed for filing in the above referenced Docket is the "Implementation Plan for IntraLATA Toll Dialing Parity" of Accent Communications, Inc.

Please note that we have indicated a date for sending carrier notification letters that is in advance of the requested plan approval date. We've done this because of certain language in the FCC's March 23rd IntraLATA Dialing Parity Order, FCC 99-54, which indicates that LECs must implement intraLATA dialing parity within 30 days after approval of their implementation plan. This would seem to mean that the actual conversion to dialing parity should be accomplished within 30 days after this commission approves the plan. Given this very short timeline, if LECs are not able to start the carrier notification process in advance of final Commission action on the plan, almost no time would be left for notifying and receiving responses from customers.

We are therefore, along with requesting approval of this filed plan, asking that the Commission grant us approval in advance of its final action on the plan to send out carrier notification letters. A sample copy of the carrier notification letter proposed for use is attached to the implementation plan as Appendix A. A sample copy of the proposed carrier participation form to be used is included with the plan as Appendix B.

If Commission Staff or the Commissioners desire any additional information to supplement this filing, please advise.

Thank you for your assistance in filing and distributing these docurn nts.

Sincerely,

Clinton Hanson, Manager Accent Communications, Inc.

IMPLEMENTATION PLAN FOR INTRALATA TOLL DIALING PARITY

Accent Communications, Inc. submits this Implementation Plan for IntraLATA Toll Dialing Parity (hereinafter referenced as "the Plan") pursuant to 47 C.F.R. § 51.213 and recent Orders of the South Dakota Public Utilities Commission (hereinafter referenced as the "Commission") which require this filing on or before April 22, 1999. The purpose of the Plan is to provide information to the Commission concerning how and when Accent Communications, Inc. will convert to intraLATA toll dialing parity, or, as it is sometimes called, intraLATA equal access. The provisioning of such capability will permit customers to select which long distance carrier they want to handle their intraLATA 1+ calls.

1. Company name and address:

Accent Communications, Inc. 235 E 1st Av PO Box 260 Groton, SD 57445-0260 FAX # 605 397-2350

2. Associated LATA:

Accent Communications, Inc. is located in and for purposes of this Plan associates with LATA 640.

3. Description of offering.

Accent Communications, Inc. will offer intraLATA toll dialing parity through the "full 2-PIC" presubscription software installed on a centralized basis at the access tandem switch of South Dakota Network, Inc. ("SDN"). The "full 2-PIC" method of presubscription allows a customer to presubscribe to one long distance carrier for all 1+ intraLATA toll calls and to presubscribe to the same or another long distance carrier for all 1+ interLATA toll calls. Because the intraLATA toll dialing parity capability will be provisioned via SDN at 2900 West 10th, Sioux Falls, SD 57104, interconnection and access necessary for participation in the offering may be ordered by long distance cariers via SDN.

4. Included local exchange areas and conversion date.

IntraLATA toll dialing parity through SDN will be made available in the following local exchange areas beginning July 22, 1999:

 Bristol, SD
 605-492

 Doland, SD
 605-635

 Frederick, SD
 605-329

 Hecla, SD
 605-994

 Northville, SD
 605-887

 N Hecla, SD
 701-992

5. Interexchange carrier "carrier" notification.

All carriers certified in South Dakota to provide long distance services will be notified by June 1, 1999, of the conversion to intraLATA toll dialing parity (a sample copy of the carrier notification letter to be used is attached hereto as Appendix A). These carriers will be asked to respond by June 16, 1999, if they want to participate in the intraLATA toll presubscription process (a sample copy of the form which carriers will complete to indicate their participation in the presubscription process is attached hereto as Appendix B). For those carriers that choose to participate in the presubscription process, information regarding customer choices will be forwarded by the local exchange carrier to the participating carriers through the "Customer Account Record Exchange" ("CARE") process in place today for exchanging information regarding interLATA toll selections. The CARE process allows for a regular reporting via magnetic tape or facsimile transmission of customer carrier selections between local exchange carriers and long distance carriers.

Accent Communications, Inc. will also provide a summary report that will list all carrier selections received for the long distance carrier for whom the report is prepared. This report will be mailed to each participating long distance carrier in advance of the intraLATA dialing parity implementation date.

Accent Communications, Inc. will make available preconversion customer name and address lists. These customer lists are available to assist participating carriers in their presubscription solicitation efforts. These lists may be provided subject to a reasonable, non-discriminatory fer, with delivery contingent upon the carrier meeting all requirements for participation in the intraLATA presubscription process.

6. Customer notification.

A. Current customers.

Customers will be notified of the conversion to intraLATA toll dialing parity by letter postmarked by no later than June 25, 1999. In such letter, customers will be advised of their intraLATA choices. Customers will be given the option to remain with their existing intraLATA 1+ carrier, James Valley Long Distance, or to choose a different intraLATA carrier for their 1+ service. The letter will include a list indicating all carriers in addition to the existing 1+ carrier that have chosen to participate in the intraLATA toll presubscription process (a sample copy of the customer notification letter that will be used is attached hereto as Appendix C).

Accent Communications, Inc. will include with the customer notification letter a customer response form (a sample copy of the customer response form to be used is attached hereto as Appendix D). Customers will be advised that if they choose a carrier other than their existing intraLATA 1+ carrier, they must fill out and return the response form postmarked by July 12, 1999. Those customers choosing to stay with their existing intraLATA 1+ carrier, will not have to return the response form. Their intraLATA 1+ service will remain with their current provider. Based on the customer response forms received and any letters of agency received directly

3

from participating carriers, Accent Communi itions, Inc., as of the date and time that intraLATA dialing parity is implemented, will execute all necessary carrier selection changes.

Customers will not be charged for making any change to their intraLATA 1+ carrier during the presubscription process. In addition, customers will be advised that they will be given 60 days after the intraLATA toll dialing parity implementation date to change their intraLATA 1+ carrier at no charge.

B. New customers.

New customers to Accent Communications, Inc.'s local exchange service, commencing such service after June 25, 1999, will be asked to choose both an intraLATA and interLATA carrier. They will be informed that regulations require that they choose a carrier for their intraLATA 1+ service (for calls within this LATA) and also choose a carrier for their interLATA 1+ service (for calls going outside this LATA). Accent Communications, Inc. will either inform or provide new customers a list of all carriers participating in intraLATA 1+ services and all carriers participating in interLATA 1+ services. Customer service representatives of Accent Communications, Inc. will reference the names of all carriers in the customer's exchange area providing 1+ toll service. If the customer requests, the customer service representative will provide contact telephone numbers for the available carriers. Lists used by the customer service representatives will contain carriers' names in random order.

Customers applying for service will be encouraged to make a carrier selection. New customers will make an affirmative selection before they will be assigned to any carrier for either their intraLATA 1+ or interLATA 1+ service. New customers will be advised that neither intraLATA 1+ dialed calls or interLATA 1+ dialed calls originated from the customer's local line will be possible until a carrier selection is made. Until a selection is made, non-selecting customers will need to dial a carrier access code to make either intraLATA or interLATA toll calls.

7. Request for approval of Plan.

Accent Communications, Inc. asks that the Commission grant its official approval of this Plan no earlier than June 22, 1999.

Dated this 20th day of April, 1999.

Respectfully submitted,

Phit Itames

Clinton Hanson, Manager Accent Communications, Inc.

ACCENT COMMUNICATIONS, INC. IntraLATA Dialing Parity Timeline

Carrier notifications completed by: June 1, 1999

Carrier responses due by: June 16, 1999

Customer notification completed by: June 25, 1999

Due date for customer response forms: July 12, 1999

IntraLATA dialing parity implementation date: July 22, 1999

End of 60 day grace period: September 20, 1999

APPENDIX A

Date

TO: All Long Distance Carriers of Record in the State of South Dakota

ATTN: Route to person responsible for regulatory matters.

Accent Communications, Inc. (ACI) is pleased to announce the provisioning of IntraLATA equal access in certain local exchange areas. A list of these exchanges is attached. This service will be made available to customers on July 22, 1999.

It is ACI's intent to work closely with all users of access and maintain an impartial position with regard to the end user's selection of an IntraLATA long distance carrier. ACI will supply a PIC list for the end user's selection of an IntraLATA long distance carrier. However, because IntraLATA equal access will be provisioned via South Dakota Network (SDN) at 2900 West 10th Street, Sioux Falls, SD 57104, interconnection and access may be ordered via SDN.

Please complete and return the attached form if you wish to be a carrier of choice on the IntraLATA equal access PIC list for the exchanges listed on the next page.

Questions may be directed to Nancy Larsen at 397-2323.

You must return your request for participation postmarked no later than June 16, 1999, to:

Nancy Larsen Accent Communications, Inc. 235 E 1st Av PO Box 260 Groton, SD 57445 Fax # 605-397-2350

Sincerely,

Clinton Hanson, Manager Accent Communications, Inc.

cc: Bill Bullard, South Dakota Public Utilities Commission

Accent Communications, Inc. exchanges to provide IntraLATA equal access:

TOWN	NPA	NXX
Bristol	605	492
Doland	605	635
Frederick	605	329
Hecla	605	994
Northville	605	887
North Hecla	701	992

APPENDIX B

INTRALATA PIC LIST PARTICIPATION FORM FOR ACCENT COMMUNICATIONS, INC.

CARRIER NAME	
ACNA	
CIC	
BILLING ADDRESS	
BILLING CONTACT	
PHONE NUMBER	
FAX NUMBER	
E-MAIL ADDRESS	
CUSTOMER SERVICE NUMBER (BUSINESS)	
CUSTOMER SERVICE NUMBER (RESIDENCE)	
WOULD LIKE TO BE INCLUDED ON THE INTRALATA PIC LIST?	YES NO
SIGNATURE	
TITLE	
DATE	

Please respond by June 16, 1999.

Address: Nancy Larsen Accent Communications, Inc. PO Box 260 Groton, SD 57445-0260

APPENDIX C

Date:

To: All Customers of Accent Communications, Inc.

Accent Communications, Inc. is pleased to announce that effective July 22, 1999, it will be making changes to its telephone switching equipment which will allow for intraLATA long distance dialing parity in y aur local exchange area. With these changes, you will have the ability to select the long distance company for your intraLATA (generally in-state) 1+ long distance service.

In conjunction with making these changes, Accent Communications, Inc. is asking all of its local exchange subscribers to choose whether they wish to retain the current long distance company providing their intraLATA 1+ long distance service or wish to select another company for such service.

Currently James Valley Long Distance provides you with 1+ long distance service for your intraLATA (generally in-state calls). This company will continue to provide service to you unless you tell us to make a change and select another carrier. If you do nothing, your 1+ intraLATA long distance service will remain with James Valley Long Distance.

Attached is a list of long distance companies, other than James Valley Long Distance, that have agreed to provide 1+ intraLATA long distance services in your area. If you would like one of these other companies to provide your service, please complete the customer response form that is also attached and return it to our business office by July 12, 1999.

You will not be charged for making a change to your existing 1+ intraLATA long distance service in response to this notice. In addition, for a period of 60 days after July 22, 1999, you may decide to change your 1+ intraLATA long distance carrier, one time, at no charge.

Please call our office at 605 - 397-2323 if you have any questions on this matter.

Sincerely,

Accent Communications, Inc.

LIST

Listed below are the other Long Distance companies that are willing to offer you IntraLATA 1+ (generally in-state) long distance services. If you wish to change your intraLATA 1+ long distance carrier, please complete the attached form and return it by July 12, 1999, to Accent Communications, Inc. PO Box 260, Groton, SD 57445.

ABC Telephone Company, Inc. Bus/Res: 1-800-555-1234

LMNOP Telecommunications Bus: 1-800-555-2345

ZXC Telephone Company Bus/Res: 1-800-555-3456

Please respond on or before July 12, 1999.

APPENDIX D

1+ IntraLATA or In-State Long Distance Company Customer Response Form (Please print)

TO:

(Subscriber Billing Name) (Billing Address) (City, State, Zip)

1+ IntraLATA (generally in-state) Long Distance Company.

Please change my IntraLATA Long Distance Company:

Telephone Number(s)

Carrier Name

I authorize Accent Communications, Inc. to make the above carrier change(s). I understand that only one carrier may be designated as my intraLATA or in-state preferred interexchange carrier (PIC) for any one telephone number.

X Subscriber's Signature (Required)

X Date (Required)

NOTE: You do not need to return this form if you wish to retai your current intraLATA or 1+ instate long distance carrier, James Valley Long Distance.



RECEIVED

APR 2 1 1999

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

April 20, 1999

Bill Bullard, Executive Director South Dakota Public Utilities Commission State Capitol Building 500 East Capitol Ave. Pierre, South Dakota 57501

RE: Docket TC99-030 (Implementation Plan for IntraLATA Dialing Parity)

Dear Bill:

Enclosed for filing in the above referenced Docket is the "Implementation Plan for IntraLATA Toll Dialing Parity" of Splitrock Properties, Inc.

Please note that we have indicated a date for sending carrier notification letters that is in advance of the requested plan approval date. We've done this because of certain language in the FCC's March 23rd IntraLATA Dialing Parity Order, FCC 99-54, which indicates that LECs must implement intraLATA dialing parity within 30 days after approval of their implementation plan. This would seem to mean that the actual conversion to dialing parity should be accomplished within 30 days after this Commission approves the plan. Given this very short timeline, if LECs are not able to start the carrier notification process in advance of final Commission action on the plan, almost no time would be left for notifying and receiving responses from customers.

We are therefore, along with requesting approval of this filed plan, asking that the Commission grant us approval in advance of its final action on the plan to send out carrier notification letters. A sample copy of the carrier notification letter proposed for use is attached to the implementation plan as Appendix A. A sample copy of the proposed carrier participation form to be used is included with the plan as Appendix B.

If Commission Staff or the Commissioners desire any additional information to supplement this filing, please advise.

Thank you for your assistance in filing and distributing these documents.

Don Snyders, Manager Splitrock Properties, Inc.

P.O. Box 349

Garretson, SD 57030

Phone: 605-594-3411

Fax: 605-594-6776

Howard: 605-772-4644

Oldham: 605-482-9644

IMPLEMENTATION PLAN FOR INTRALATA TOLL DIALING PARITY

Splitrock Properties, Inc. submits this Implementation Plan for IntraLATA Toll Dialing Parity (hereinafter referenced as "the Plan") pursuant to 47 C.F.R. § 51.213 and recent Orders of the South Dakota Public Utilities Commission (hereinafter referenced as the "Commission") which require this filing on or before April 22, 1999. The purpose of the Plan is to provide information to the Commission concerning how and when Splitrock Properties, Inc. will convert to intraLATA toll dialing parity, or, as it is sometimes called, intraLATA equal access. The provisioning of such capability will permit customers to select which long distance carrier they want to handle their intraLATA 1+ calls.

1. Company name and address:

Splitrock Properties, Inc, 612 Third St, PO Box 349, Garretson, SD 57030, 605-594-3411, 605-594 6776 (fax)

2. Associated LATA:

Splitrock Properties, Inc. is located in and for purposes of this Plan associates with LATA 640.

3. Description of offering.

Splitrock Properties, Inc. will offer intraLATA toll dialing parity through the "full 2-PIC" presubscription software installed on a centralized basis at the access tandem switch of South Dakota Network, Inc. ("SDN"). The "full 2-PIC" method of presubscription allows a customer to presubscribe to one long distance carrier for all 1+ intraLATA toll calls and to presubscribe to the same or another long distance carrier for all 1+ interLATA toll calls. Because the intraLATA toll dialing parity capability will be provisioned via SDN at 2900 West 10th, Sioux Falls, SD 57104, interconnection and access necessary for participation in the offering may be ordered by long distance carriers via SDN.

4. Included local exchange areas and conversion date.

IntraLATA toll dialing parity through SDN wil¹ be made available in the following local exchange areas beginning July 22, 1999:

Howard/Carthage - 605 - 772 Oldham/Ramona - 605 - 482

5. Interexchange carrier "carrier" notification.

All carriers certified in South Dakota to provide long distance services will be notified by June 1, 1999, of the conversion to intraLATA toll dialing parity (a sample copy of the carrier notification letter to be used is attached hereto as Appendix A). These carriers will be asked to respond by June 16, 1999, if they want to participate in the intraLATA toll presubscription process (a sample copy of the form which carriers will complete to indicate their participation in the presubscription process is attached hereto as Appendix B). For those carriers that choose to participate in the presubscription process, information regarding customer choices will be forwarded by the local exchange carrier to the participating carriers through the "Customer Account Record Exchange" ("CARE") process in place today for exchanging information regarding interLATA toll selections. The CARE process allows for a regular reporting via magnetic tape or facsimile transmission of customer carrier selections between local exchange carriers and long distance carriers.

Splitrock Properties, Inc. will also provide a summary report that will list all carrier selections received for the long distance carrier for whom the report is prepared. This report will be mailed to each participating long distance carrier in advance of the intraLATA dialing parity implementation date.

Splitrock Properties, Inc. will make available preconversion customer name and address lists. These customer lists are available to assist participating carriers in their presubscription solicitation efforts. These lists may be provided subject to a reasonable, non-discriminatory fee, with delivery contingent upon the carrier meeting all requirements for participation in the intraLATA presubscription process.

6. Customer notification.

A. Current customers.

Customers will be notified of the conversion to intraLATA toll dialing parity by letter postmarked by no later than June 25, 1999. In such letter, customers will be advised of their intraLATA choices. Customers will be given the option to remain with their existing intraLATA 1+ carrier. [provide name of current 1+ intraLATA carrier], or to choose a different intraLATA carrier for their 1+ service. The letter will include a list indicating all carriers in addition to the existing 1+ carrier that have chosen to participate in the intraLATA toll presubscription process (a sample copy of the customer notification letter that will be used is attached hereto as Appendix C).

Splitrock Properties, Inc. will include with the customer notification letter a customer response form (a sample copy of the customer response form to be used is attached hereto as Appendix D). Customers will be advised that if they choose a carrier other than their existing intraLATA 1+ carrier, they must fill out and return the response form postmarked by July 12, 1999. Those customers choosing to stay with their existing intraLATA 1+ carrier, will not have to return the response form. Their intraLATA 1+ service will remain with their current provider. Based on the customer response forms received and any letters of agency received directly from

participating carriers, Splitrock Properties, Inc., as of the date and time that intraLATA dialing parity is implemented, will execute all necessary carrier selection changes.

Customers will not be charged for making any change to their intraLATA 1+ carrier during the presubscription process. In addition, customers will be advised that they will be given 60 days after the intraLATA toll dialing parity implementation date to change their intraLATA 1+ carrier at no charge.

B. New customers.

New customers to Splitrock Properties, Inc.'s local exchange service, commencing such service after July 22, 1999, will be asked to choose both an intraLATA and interLATA carrier. They will be informed that regulations require that they choose a carrier for their intraLATA 1+ service (for calls within this LATA) and also choose a carrier for their interLATA 1+ service (for calls going outside this LATA). Splitrock Properties, Inc. will either inform or provide new customers a list of all carriers participating in intraLATA 1+ services and all carriers participating in interLATA 1+ services. Customer service representatives of Splitrock Properties, Inc. will reference the names of all carriers in the customer's exchange area providing 1+ toll service. If the customer requests, the customer service representative will provide contact telephone numbers for the available carriers. Lists used by the customer service representatives will contain carriers' names in random order.

Customers applying for service will be encouraged to make a carrier selection. New customers will make an affirmative selection before they will be assigned to any carrier for either their intraLATA 1+ or interLATA 1+ service. New customers will be advised that neither intraLATA 1+ dialed calls or interLATA 1+ dialed calls originated from the customer's local line will be possible until a carrier selection is made. Until a selection is made, non-selecting customers will need to dial a carrier access code to make either intraLATA or interLATA toll calls.

7. Request for approval of Plan.

Splitrock Properties, Inc. asks that the Commission grant its official approval of this Plan no earlier than June 22, 1999.

Dated this 20th day of April, 1999.

Respectfully submitted

Don Snydors, Manager Splitrock Properties, Inc.

Splitrock Properties, Inc. IntraLATA Dialing Parity Timeline

Carrier notifications completed by: June 1, 1999

Carrier responses due by: June 16, 1999

Customer notification completed by: June 25, 1999

Due date for customer response forms: July 12, 1999

IntraLATA dialing parity implementation date: July 22, 1999

End of 60 day grace period: September 20, 1999

APPENDIX A

Date April 20, 1999

TO: All Long Distance Carriers of Record in the State of South Dakota

Splitrock Properties, Inc. is pleased to announce the provisioning of IntraLATA equal access in certain local exchange areas. A list of these exchanges is attached. This service will be made available to customers on July 22, 1999.

It is Splitrock Properties, Inc.'s intent to work closely with all users of access and maintain an impartial position with regard to the end user's selection of an IntraLATA long distance carrier. Splitrock Properties, Inc. will supply a PIC list for the end user's selection of an IntraLATA long distance carrier. However, because IntraLATA equal access will be provisioned via South Dakota Network (SDN) at 2900 West 10th Street, Sioux Falls, SD 57104, interconnection and access may be ordered via SDN.

Please complete and return the attached form if you wish to be a carrier of choice on the IntraLATA equal access PIC list for the exchanges listed on the next page.

Questions may be directed to Don Snyders at 605-594-3411.

You must return your reque: t for participation postmarked no later than June 16, 1999, to:

Don Snyders Splitrock Properties, Inc. PO Box 349 Garretson, SD 57030 605-594-6776 (Fax)

Sincerely,

Don Snyders, Manager

cc: Bill Bullard, South Dakota Public Utilities Commission

Splitrock Properties, Inc. exchanges to provide IntraLATA equal access:

TOWN	NPA	NXX
Howard/Carthage	605	772
Oldham/Ramona	605	482

APPENDIX B

INTRALATA PIC LIST PARTICIPATION FORM FOR SPLITROCK PROPERTIES, INC.

CARRIER NAME	
ACNA	
CIC	
BILLING ADDRESS	
BILLING CONTACT	
PHONE NUMBER	
FAX NUMBER	
E-MAIL ADDRESS	
CUSTOMER SERVICE NUMBER (BUSINESS)	
CUSTOMER SERVICE NUMBER (RESIDENCE)	
WOULD YOU LIKE TO BE INCLUDED ON THE INTRALATA PIC LIST?	YES NO
SIGNATURE	
DATE	

Please respond by June 16, 1999. Address: Don Snyders Splitrock Properties, Inc. PO Box 349, Garretson, SD 57030

APPENDIX C

Date: April 20, 1999

To: All Customers of Splitrock Properties, Inc.

Splitrock Properties, Inc. is pleased to announce that effective July 22, 1999, we will make it possible for you to choose from various long distance companies for your in-state 1+ long distance service (intraLATA long distance service). This service includes all of your intrastate long distance calls made by dialing 1 plus the area code and local telephone number. With these changes, you will have the ability to select a long distance company for your in-state 1+ long distance service.

In conjunction with making these changes, Splitrock Properties, Inc. is asking all of its local exchange subscribers to choose whether they wish to retain the current long distance company providing their in-state 1+ long distance service or select another company for the service.

Currently Splitrock Long Distance provides your in-state 1+ long distance service. This company will continue to provide service to you unless you tell us to make a change and select another carrier. If you do nothing, your in-state 1+ long distance service will remain with Splitrock Long Distance.

Attached is a list of long distance companies, in addition to Splitrock Long Distance that have agreed to provide 1+ in-state long distance services in your area. If you would like one of these other companies to provide your service, please complete the customer response form that is also attached and return it to our business office postmarked by no later than July 12, 1999.

You will not be charged for making a change to your existing in-state 1+ long distance service in response to this notice. In addition, for a period of 60 days after July 22, 1999, you may decide to change your in-state 1+ long distance carrier, one time, at no charge. After September 20, 1999, you will incur a Primary Interexchange Carrier (PIC) charge of \$5.00 for changing carriers.

Please call our office at 605-772-4644 if you have any questions on this matter.

Sincerely,

Splitrock Properties, Inc.

Listed below are the other Long Distance companies that are willing to offer you IntraLATA 1+ (generally in-state) long distance services. If you wish to change your intraLATA 1+ long distance carrier, please complete the attached form and return it postmarked by July 12, 1999, to Splitrock Properties, Inc., PO Box 349, Garretson, SD, 57030.

(Example):

ABC Telephone Company, Inc. Bus/Res: 1-800-555-1234

LMNOP Telecommunications Bus: 1-800-555-2345

ZXC Telephone Company Bus/Res: 1-800-555-3456

Please respond on or before Ji ly 12, 1999.

APPENDIX D

In-State 1+ Long Distance Service (IntraLATA Long Distance Service) Customer Response Form (Please print)

Subscriber Billing Name:

Billing Address:

. . .

(City, State, Zip)

Please change my long distance company for in-state (IntraLATA) 1+ long distance calls:

to to

to to

to

Telephone Number(s)

I authorize Splitrock Properties, Inc. to make the above carrier change(s). I understand that only one carrier may be designated as my intraLATA or in-state preferred interexchange

only one carrier may be designated as my intraLATA or in-state preferred interexchange carrier (PIC) for any one telephone number.

X Subscriber's Signature (Required)

NOTE: You do not need to return this form if you wish to retain your current intraLATA or 1+ in-state long distance carrier, Splitrock Long Distance.

Carrier Name

X Date (Required)



CI-A wholly owned subsidiary of Sully Buttes Telephone Cooperative. Inc.

RECEIVED

APR 2 1 1999

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

Bill Bullard, Executive Director South Dakota Public Utilities Commission State Capitol Building 500 E at Capitol Ave. Pierre, SD 57501

RE: Docket TC99-030 (Implementation Plan for IntraLATA Dialing Parity)

Dear Bill:

April 20, 1999

Enclosed for filing in the above referenced Docket is the "Implementation Plan for IntraLATA Toll Dialing Parity" of Venture Communications, Inc.

Please note that we have indicated a date for sending carrier notification letters that is in advance of the requested plan approval date. We've done this because of certain language in the PCC's March 23nd IntraLATA Dialing Parity Order, FCC 99-54, which indicates that LECs must implement intraLATA dialing parity within 30 days after approval of the implementation plan. This would seem to mean that the actual conversion to dialing parity should be accomplished within 30 days after this Commission approves the plan. Given this very short timeline, if LECs are not able to start the carrier notification process in advance of final Commission action on the plan, almost no time would be left for notifying and receiving responses from customers.

We are therefore, along with requesting approval of this filed plan, asking that the Commission grant us approval in advance of its final action on the plan to send out carrier notification letters. In addition, we respectfully request in advance a list of all carriers who have been approved by the South Dakota PUC to provide long distance service in the State of South Dakota. A sample copy of the carrier notification letter proposed for use is attached to the implementation plan as Appendix A. A sample copy of the proposed carrier participation form to be used is included with the plan as Appendix B.

If Commission Staff or the Commissioners desire any additional information to supplement this filing, please advise.

Thank you for your assistance in filing and distributing these documents.

Sincerely.

VENTURE COMMUNICATIONS, INC.

Randy Houdek

General Manager

RECEIVED

APR 2 1 1999

IMPLEMENTATION PL AN FOR INTRALATA TOLL DIALING PARITY

SOUTH DAKOTA PUBLIC

Venture Communications, Inc. submits this Implementation Plan for IntraLATA Toll Dialing Parity (hereinafter referenced as "the Plan") pursuant to 47 C.F.R. § 51.213 and recent Orders of the South Dakota Public Utilities Commission (hereinafter referenced as the "Commission") which require this filing on or before April 22, 1999. The purpose of the Plan is to provide information to the Commission concerning how and when Venture Communications, Inc. will convert to intraLATA toll dialing parity, or, as it is sometimes called, intraLATA equal access. The provisioning of such capability will permit customers to select which long distance carrier they want to handle their intraLATA 1+ calls.

1. Company name and address:

Venture Communications Inc.	Phone number:	605-852-2224
218 Commercial SE	Fax Number:	605-852-2404
PO Box 157		
Highmore, SD 57345		

2. Associated LATA:

Venture Communications, Inc. is located in and for purposes of this Plan associates with LATA 640.

3. Description of offering.

Venture Communications, Inc. will offer intraLATA toll dialing parity through the "full 2-PIC" presubscription software installed on a centralized basis at the access tandem switch of South Dakota Network, Inc. ("SDN"). The "full 2-PIC" method of presubscription allows a customer to presubscribe to one long distance carrier for all 1+ intraLATA toll calls and to presubscribe to same or another long distance carrier for all 1+ interLATA toll calls. Because the intraLATA toll dialing parity capability will be provisioned via SDN at 2900 West 10th, Sioux Falls, SD 57104, interconnection and access necessary for participation in the offering may be ordered by long distance carriers via SDN.

4. Included local exchange areas and conversion date.

IntraLATA toll dialing parity through SDN will be made available in the following local exchange areas beginning July 22, 1999:

North Britton	701-443	Pierpont	605-325
Britton	605-448	Roscoe	605-287
Bowdle	605-285	Roslyn	605-486
Gettysburg	605-765	Selby	605-649
Lebanon	605-768	Wess. Springs	605-539
Onida	605-258		

5. Interexchange carrier "carrier" notification.

All carriers certified in South Dakota to provide long distance services will be notified by June 1, 1999, of the conversion to intraLATA toll dialing parity (a sample copy of the carrier notification letter to be used is attached hereto as Appendix A). These carriers will be asked to respond by June 16, 1999, if they want to participate in the intraLATA toll presubscription process (a sample copy of the form which carriers will complete to indicate their participation in the presubscription process is attached hereto as Appendix B). For those carriers that choose to participate in the presubscription process, information regarding customer choices will be forwarded by the local exchange carrier to the participating carriers through the "Customer Account Record Exchange" ("CARE") process in place today for exchanging information regarding interLATA toll selections. The CARE process allows for a regalar reporting via magnetic tape or paper transmission of customer carrier selections between local exchange carriers and long distance carriers.

Venture Communications, Inc. will also provide a summary report that will list all carrier selections received for the specific long distance carrier for whom the report is prepared. Upon request this report will be mailed to each participating long distance carrier in advance of the intraLATA dialing parity implementation date.

Venture Communications, Inc. will make available pre-conversion customer name and address lists upon the request of the long distance carrier. These customer lists are available to assist participating carriers in their presubscription solicitation efforts. These lists may be provided subject to a reasonable, discriminatory fee, with delivery contingent upon the carrier meeting all requirements for participation in the intraLATA presubscription process.

6. Customer notificat on.

A. Current customers.

Customers will be notified of the conversion to intraLATA toll dialing parity by letter postmarked by no later than June 25, 1999. In such letter, customers will be advised of their intraLATA choices. Customers will be given the option to remain with their existing intraLATA 1+ carrier, Sully Buttes Long Distance, or to choose a different intraLATA carrier for their 1+ service. The letter will include a list indicating all carriers in addition to the existing 1+ carrier that have chosen to participate in the intraLATA toll presubscription process (a sample copy of the customer notification letter that will be used is attached hereto as Appendix C).

Venture Communications, Inc. will include with the customer notification letter a customer response form (a sample copy of the customer response form to be used is attached hereto as Appendix D). Customers will be advised that if they choose a carrier other than their existing intraLATA 1+ carrier, they must fill out and return the response form postmarked by July 12, 1999. Those customers choosing to stay with their existing intraLATA 1+ carrier, will not have to return the response form. Their intraLATA 1+ service will remain with their current provider. Based on the customer response forms received and any letters of agency received directly from participating carriers, Venture Communications, Inc., as of the date and time that intraLATA dialing parity is implemented, will execute all necessary carrier selection changes.

Customers will not be charged for making any change to their intraLATA 1+ carrier during the presubscription process. In addition, customers will be advised that they will be given 60 days after the intraLATA toll dialing parity implementation date to change their intraLATA 1+ carrier at no charge.

B. New customers.

New customers to Venture Communications, Inc.'s local exchange service, commencing such service after June 25, 1999, will be asked to choose both an intraLATA and interLATA carrier. They will be informed that regulations require that they choose a carrier for their intraLATA 1+ service (for calls within this LATA) and also choose a carrier for their interLATA 1+ service (for calls going outside this LATA). Venture Communications, Inc. will either inform or provide new customers a list of all carriers participating in intraLATA 1+ services and all carriers participating in interLATA 1+ services. Customer service representatives of Venture Communications, Inc. will reference the names of all carriers in the customer's exchange area providing 1+ toll service. If the customer requests, the customer service representative will provide contact telephone numbers for the available carriers. Lists used by the customer service representatives will contain carriers' names in random order.

Customers applying for service will be encouraged to make a carrier selection. New customers will make an affirmative selection before they will be assigned to any carrier for either their intraLATA 1+ or interLATA 1+ service. New customers will be advised that neither intraLATA 1+ dialed calls or interLATA 1+ dialed calls originated from the customer's local line will be possible until a carrier selection is made.

7. Request for approval of Plan.

Venture Communications, Inc. asks that the Commission grant its official approval of this Plan no earlier than June 22, 1999.

Dated this 20th day of April, 1999.

Respectfully submitted,

Handy I Hudik

Randy W/Houdek Manager, Venture Communications, Inc.

3

Venture Communications, Inc. IntraLATA Dialing Parity Timeline

Carrier notifications completed by: June 1, 1999

Carrier responses due by: June 16, 1999

Customer notification completed by: June 25, 1999

Due date for customer response forms: July 12, 1999

IntraLATA dialing parity implementation date: July 22, 1999

End of 60 day grace period: September 20, 1999

APPENDIX A

Date

TO: All Long Distance Carriers of Record in the State of South Dakota

Venture Communications, Inc. is pleased to announce the provisioning of IntraLATA equal access in certain local exchange areas. A list of these exchanges is attached. This service will be made available to customers on July 22, 1999.

It is Venture Communications, Inc.'s intent to work closely with all users of access and maintain an impartial position with regard to the end user's selection of an IntraLATA long distance carrier. Venture Communications will supply a PIC list for the end user's selection of an IntraLATA long distance carrier. However, because IntraLATA equal access will be provisioned via South Dakota Network (SDN) at 2900 West 10th Street, Sioux Falls, SD 57104, interconnection and access service requests may be ordered via SDN.

Please complete and return the attached form if you wish to be a carrier of choice on the IntraLATA equal access PIC list for the exchanges listed on the next page.

Questions may be directed to Chuck Fejfar at 800-247-1442.

You must return your request for participation postmarked no later than June 16, 1999, to:

Chuck Fejfar South Dakota Network 2900 West 10th St. Sioux Falls, SD 57104 FAX # 605-334-4782

A carbon copy of this request should be sent to:

Janice Volek Phone # 605-852-2224 Venture Communications, Inc. FAX # 605-852-2404 PO Box 476 Highmore, SD 57345

Sincerely,

VENTURE COMMUNICATIONS, INC.

Randy Houdek General Manager

cc: Bill Bullard, South Dakota Public Utilities Commission

Venture Communications, Inc. exchanges to provide IntraLATA equal access:

TOWN	NPA	NXX
North Britton	701	443
Britton	605	448
Bowdle	605	285
Gettysburg	605	765
Lebanon	605	768
Onida	605	258
Pierpont	605	325
Roscoe	605	287
Roslyn	605	486
Selby	605	649
Vessington Springs	605	539

6

APPENDIX B

INTRALATA PIC LIST PARTICIPATION FORM FOR VENTURE COMMUNICATIONS, INC.

CARRIER NAME	
ACNA	
CIC	
BILLING ADDRESS	
BILLING CONTACT	
PHONE NUMBER	
FAX NUMBER	
E-MAIL ADDRESS	
CUSTOMER SERVICE NUMBER (BUSINESS)	
CUSTOMER SERVICE NUMBER (RESIDENCE)	
WOULD YOU LIKE TO BE INCLUDED ON THE INTRALATA PIC LIST?	YES NO
SIGNATURE	
TITLE	
DATE	

Please respond by June 16, 1999.

To: Chuck Fejfar South Dakota Network 2900 West 10th St. Sioux Falls, SD 57104 FAX # 605-334-4782 Carbon Copy to: Janice Volek Venture Communications, Inc. PO Box 476 Highmore, SD 57345 FAX # 605-852-2404

APPENDIX C

Date:

To: All Customers of Venture Communications, Inc.

Venture Communications, Inc. is pleased to announce that effective July 22, 1999, we will make it possible for you to choose from various long distance companies for your in-state 1+ long distance service (intraLATA long distance service). This service includes all of your intrastate long distance calls made by dialing 1 plus the area code and local telephone number. With these changes, you will have the ability to select a long distance company for your in-state 1+ long distance service.

In conjunction with making these changes, Venture Communications, Inc. is asking all of its local exchange subscribers to choose whether they wish to retain the current long distance company providing their intraLATA 1+ long distance service or wish to select another company for such service.

Currently Sully Buttes Long Distance provides you with 1+ long distance service. This company will continue to provide service to you unless you tell us to make a change and select another carrier. If you do nothing, your in-state1+ long distance service will remain with Sully Buttes Long Distance.

Attached is a list of long distance companies, in addition to Sully Buttes Long Distance, that have agreed to provide 1+ in-state long distance service in your area. If you would like one of these other companies to provide your service, please complete the customer response form that is also attached and return it to our business office by July 12, 1999.

You will not be charged for making a change to your existing in-state 1+ long distance service in response to this notice. In addition, for a period of 60 days after July 22, 1999, you may decide to change your in-state 1+ long distance carrier, one time, at no charge. After September 20, 1999, you will incur a Primary Interexchange Carrier (PIC) charge of \$5.00 for changing carriers.

Customers who wish to be placed on a specific calling plan with their selected long distance company must contact the long distance carrier to set up the plan.

Should you have any questions on this matter, please call our office at 800-824-7282 or simply dial 811.

Sincerely,

VENTURE COMMUNICATIONS, INC.

Randy Houdek General Manager

8

LIST

Listed below are the Long Distance companies that are willing to offer you IntraLATA 1+ (generally in-state) long distance services. If you wish to change your intraLATA 1+ long distance carrier from Sully Buttes Long Distance, please complete the attached form and return it postmarked by July 12, 1999, to Venture Communications, Inc., Box 476, Highmore, SD 57345.

ABC Telephone Company, Inc. (0023) Bas/Res: 1-800-555-1234

LMNOP Telecommunications (0288) Bus: 1-800-555-2345

ZXC Telephone Company (0333) Bus/Res: 1-800-555-3456

Sully Buttes Long Distance (0865) Bus/Res: 1-800-824-7282 (Current carrier – No action necessary if this is your carrier of choice)

Please respond on or before July 12, 1999.

APPENDIX D

1+ IntraLATA or In-State Long Distance Company Customer Response Form

(Please print legibly and complete all information)

Subscriber Billing Name:

Billing Address:

Please change my long distance company for in-state (IntraLATA) 1+ long distance calls: (a carrier selection must be made for all telephone lines including second lines, fax or computer lines, etc.)

to

to to

to

to

to

to

10

Telephone Number(s)

Carrier Name/Code Number

I authorize Venture Communications, Inc. to make the above carrier change(s). I understand that only one carrier may be designated as my intraLATA or in-state preferred interexchange carrier (PIC) for any one telephone number.

X Subscriber's Signature (Required)

X Date (Required)

NOTE: You do not need to return this form if you wish to retain your current intraLATA or 1+ in-state long distance carrier, Sully Buttes Long Distance.



Hanson County Telephone Company

BRYAN K. ROTH, GENERAL MANAGER P.O. Box 217 Alexandría, S.D. 57311 Telephone: (605) 239-4302 FAX: (605) 239-4301

April 19, 1999

RECEIVED

APR 2 1 1999

Bill Ballard, Executive Director South Dakota Public Utilities Commission State Capitol Building 500 East Capitol Ave. Pierre, South Dakota 57501

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

RE: Docket TC99-030 (Implementation Plan for IntraLATA Dialing Parity)

Dear Bill:

Enclosed for filing in the above referenced Docket is the "Implementation Plan for IntraLATA Toll Dialing Parity" of Hanson County Telephone Company.

Please note that we have indicated a date for sending carrier notification letters that is in advance of the requested plan approval date. We've done this because of certain language in the FCC's March 23rd IntraLATA Dialing Parity Order, FCC 99-54, which indicates that LECs must implement intraLATA dialing parity within 30 days after approval of their implementation plan. This would seem to mean that the actual conversion to dialing parity should be accomplished within 30 days after this Commission approves the plan. Given this very short timeline, if LECs are not able to start the carrier notification process in advance of final Commission action on the plan, almost no time would be left for notifying and receiving responses from customers.

We are therefore, along with requesting approval of this filed plan, asking that the Commission grant us approval in advance of its final action on the plan to send out carrier notification letters. A sample copy of the carrier notification letter proposed for use is attached to the implementation plan as Appendix A. A sample copy of the proposed carrier participation form to be used is included with the plan as Appendix B.

If Commission Staff or the Commissioners desire any additional information to supplement this filing, please advise.

Thank you for your assistance in filing and distributing these documents.

S. accrety,

Bryan K. Roth General Manager

Enclosure

IMPLEMENTATION PLAN FOR INTRALATA TOLL DIALING PARITY

Hanson County Telephone Company submits this Implementation Plan for IntraLATA Toll Dialing Parity (hereinafter referenced as "the Plan") pursuant to 47 C.F.R. § 51.213 and recent Orders of the South Dakota Public Utilities Commission (hereinafter referenced as the "Commission") which require this filing on or before April 22, 1999. The purpose of the Plan is to provide information to the Commission concerning how and when Hanson County Telephone Company will convert to intraLATA toll dialing parity, or, as it is sometimes called, intraLATA equal access. The provisioning of such capability will permit customers to select which long distance carrier they want to handle their intraLATA 1+ calls.

Company name and address;

Hanson Courty Telephone Company PO Box 217 Alexandria, SD 57311-0217 Telephone: 605-239-4302 Fax: 605-239-4301

2. Associated LATA:

Hanson County Telephone Company is located in and for purposes of this Plan associates with LATA 605.

3 Description of offering.

Hanson County Telephone Company will offer intraLATA toll dialing parity through the "full 2-PIC" presubscription software installed on a centralized basis at the access tandem switch of South Dakota Network, Inc. ("SDN"). The "full 2-PIC" method of presubscription allows a customer to presubscribe to one long distance carrier for all 1+ intraLATA toll calls and to presubscribe to the same o another long distance carrier for all 1+ intraLATA toll calls. Because the intraLATA toll dialing parity capability will be provisioned via SDN at 2900 West 10th, Sioux Falls, SD 57104, interconnection and access necessary for participation in the offering may be ordered by long distance carriers via SDN.

4. Included local exchange areas and conversion date.

IntraLATA toll dialing parity through SDN will be made available in the following local exchange areas beginning July 22, 1999.

Alexandria 605-239

5. Interexchange carrier "carrier" notification.

All carriers certified in South Dakota to provide long distance services will be notified by June 1, 1999, of the conversion to intraLATA toll dialing parity (a sample copy

1

of the carrier notification letter to be used is attached hereto as Appendix A). These carriers will be asked to respond by June 16, 1999, if they want to participate in the intraLATA toll presubscription process (a sample copy of the form which carriers will complete to indicate their participation in the presubscription process is attached hereto as Appendix B). For those carriers that choose to participate in the presubscription process, information regarding customer choices will be forwarded by the local exchange carrier to the participating carriers through the "Customer Account Record Exchange" ("CARE") process in place today for exchanging information regarding interLATA toll selections. The CARE process allows for a regular reporting via magnetic tape or facsimile transmission of customer carrier selections between local exchange carriers.

Hanson County Telephone Company will also provide a summary report that will list all carrier selections received for the long distance carrier for whom the report is prepared. This report will be mailed to each participating long distance carrier in advance of the intraLATA dialing parity implementation date.

Hanson County Telephone Company will make available preconversion customer name and address lists. These customer lists are available to assist participating carriers in their presubscription solicitation efforts. These lists may be provided subject to a reasonable non-discriminatory fee, with delivery contingent upon the carrier meeting all requirements for participation in the intraLATA presubscription process.

6. Customer notification

A Current customers

Customers will be notified of the conversion to intraLATA toll dialing parity by letter postmarked by no later than June 25, 1999. In such letter, customers will be advised of their intraLATA choices. Customers will be given the option to remain with their existing intraLATA 1+ carrier, Express Communications, Inc., or to choose a different intraLATA carrier for their 1+ service. The letter will include a list indicating all carriers in addition to the existing 1+ carrier that have chosen to participate in the intraLATA toll presubscription process (a sample copy of the customer notification letter that will be used is attached hereto as Appendix C).

Hanson County Telephone Company will include with the customer notification letter a customer response form (a sample copy of the customer response form to be used is attached hereto as Appendix D). Customers will be advised that if they choose a carrier other than their existing intraLATA 1+ carrier, they must fill out and return the response form postmarked by July 12, 1999. Those customers choosing to stay with their existing intraLATA 1+ carrier, will not have to return the response form. Their intraLATA 1+ service will remain with their current provider. Based on the customer response forms received and any letters of agency received directly from participating carriers, Hanson County Telephone Company, as of the date and time that intraLATA dialing parity is implemented, will execute all necessary carrier selection changes.

Customers will not be charged for making any change to their intraLATA 1+ carrier during the presubscription process. In addition, customers will be advised that they will be given 60 days after the intraLATA toll dialing parity implementation date to change their intraLATA 1+ carrier at no charge.

B. New customers.

New customers to Hanson County Telephone Company's local exchange service, commencing such service after June 25, 1999, will be asked to choose both an intraLATA and interLATA carrier. They will be informed that regulations require that they choose a carrier for their intraLATA 1+ service (for calls within this LATA) and also choose a carrier for their interLATA 1+ service (for calls going outside this LATA). Hanson County Telephone Company will either inform or provide new customers a list of all carriers participating in intraLATA 1+ services and all carriers participating in interLATA 1+ services. Customer service representatives of Hanson County Telephone Company will reference the names of all carriers in the customer's exchange area providing 1+ toll service. If the customer requests, the customer service representative will provide contact telephone numbers for the available carriers. Lists used by the customer service representatives will contain carriers' names in random order.

Customers applying for service will be encouraged to make a carrier selection. New customers will make an affirmative selection before they will be assigned to any carrier for either their intraLATA 1+ or interLATA 1+ service. New customers will be advised that neither intraLATA 1+ dialed calls or interLATA 1+ dialed calls originated from the customer's local line will be possible until a carrier selection is made. Until a selection is made, non-selecting customers will need to dial a carrier access code to make either intraLATA or interLATA toll calls.

7. Request for approval of Plan.

Hanson County Telephone Company asks that the Commission grant its official approval of this Plan no earlier than June 22, 1999.

Dated this 19th day of April, 1999.

Respectful y submitted,

Bryan K. Roth General Manager Hanson County Telephone Company

Hanson County Telephone Company IntraLATA Dialing Parity Timeline

Carrier notifications completed by: June 1, 1999

Carrier responses due by: June 16, 1999

Customer notification completed by: June 25, 1999

Due date for customer response forms: July 12, 1999

IntraLATA dialing parity implementation date: July 22, 1999

End of 60 day grace period: September 20, 1999

APPENDIX A

Date

TO: All Long Distance Carriers of Record in the State of South Dakota

Hanson County Telephone Company is pleased to announce the provisioning of IntraLATA equal access in certain local exchange areas. A list of these exchanges is attached. This service will be made available to customers on July 22, 1999.

It is Hanson County Telephone Company's intent to work closely with all users of access and maintain an impartial position with regard to the end user's selection of an IntraLATA long distance carrier. Hanson will supply a PIC list for the end user's selection of an IntraLATA long distance carrier. However, because IntraLATA equal access will be provisioned via South Dakota Network (SDN) at 2900 West 10th Street, Sioux Falls, SD 57104, interconnection and access may be ordered via SDN.

Please complete and return the attached form if you wish to be a carrier of choice on the IntraLATA equal access PIC list for the exchange listed on the next page.

Questions may be directed to Carla Bambas at 605-239-4302.

You must return your request for participation postmarked no later than June 16, 1999, to:

Carla Bambas Hanson County Telephone Company PO Box 217 Alexandria, SD 57311-0217 Fax #605-239-4301

Sincerely,

Bryan K. Roth General Manager

cc: Bill Bullard, South Dakota Public Utilities Commission

TOWN	NPA	NXX
Alexandria	605	239

Hanson County Telephone Company exchange to provide IntraLATA equal access:

APPENDIX B

INTRALATA PIC LIST PARTICIPATION FORM FOR HANSON COUNTY TELEPHONE COMPANY

CARRIER NAME	
ACNA	
CIC	
BILLING ADDRESS	
BILLING CONTACT	
PHONE NUMBER	
FAX NUMBER	
E-MAIL ADDRESS	
CUSTOMER SERVICE NUMBER (BUSINES:)	
CUSTOMER SERVICE NUMBER (RESIDENCE)	
WOULD YOU LIKE TO BE INCLUDED ON THE INTRALATA PIC LIST?	YES NO
SIGNATURE	
TITLE	
DATE	

Please respond by June 16, 1999.

Carla Bambas Hanson County Telephone Company PO Box 217 Alexandria, SD 57311-0217

APPENDIX C

Date:

To: All Customers of Hanson County Telephone Company

Hanson County Telephone Company is pleased to announce that effective July 22, 1999, we will make it possible for you to choose from various long distance companies for your in-state 1+ long distance service (intraLATA long distance service). This service includes all of your intrastate long distance calls made by dialing 1 plus the area code and local telephone number. With these changes, you will have the ability to select a long distance company for your in-state 1+ long distance service.

In conjunction with making these changes, Hanson County Telephone Company is asking all of its local exchange subscribers to choose whether they wish to retain the current long distance company providing their in-state 1+ long distance service or select another company for the service.

Currently Express Communications, Inc. provides your in-state1+ long distance service. This company will continue to provide service to you unless you tell us to make a change and select another carrier. If you do nothing, your in-state 1+ long distance service will remain with Express Communications, Inc.

Attached is a list of long distance companies, in addition to Express Communications, Inc., that have agreed to provide 1+ in-state long distance services in your area. If you would like one of these other companies to provide your service, please complete the customer response form that is also attached and return it to our business office postmarked by no later than July 12, 1999.

You will not be charged for making a change to your existing in-state 1+ long distance service in response to this notice. In addition, for a period of 60 days after July 22, 1999, you may decide to change your in-state1+ long distance carrier, one time, at no charge. After September 20, 1999, you will incur a Primary Interexchange Carrier (PIC) charge of \$5.00 for changing carriers.

Please call our office at 239-4302 if you have any questions on this matter.

Sincerely,

Hanson County Telephone Company

LIST

Listed below are the other Long Distance companies that are willing to offer you IntraLATA 1+ (generally in-state) long distance services. If you wish to change your intraLATA 1+ long distance carrier, please complete the attached form and return it postmarked by July 12, 1999, to Hanson County Telephone Company, PO Box 217 Alexandria, SD 57311-0217.

ABC Telephone Company, Inc. Bus/Res: 1-800-555-1234

LMNOP Telecommunications Bus: 1-800-555-2345

ZXC Telephone Company Bus/Res: 1-800-555-3456

Please respond on or before July 12, 1999.

10

APPENDIX D

In-State 1+ Long Distance Service (IntraLATA Long Distance Service) Customer Response Form (Please print)

Subscriber Billing Name

Billing Address:

(City, State, Zip)

Please change my long distance company for in-state (IntraLATA) 1+ long distance calls:

to to

Please change my IntraLATA Long Distance Compuny:

Telephone Number(s)

to to to to to to to to to

I authorize Hanson County Telephone Company to make the above carrier change(s). I understand that only one carrier may be designated as my intraLATA or in-state preferred interexchange carrier (PIC) for any one telephone number.

X Subscriber's Signature (Required)

NO'i'E: You do not need to return this form if you wish to retain your current intraLATA or 1+ in-state long distance carrier, Express Communications, Inc.

X Date (Required)

Carrier Name

Hanson Communications, Inc.

Bryan K. Roth, CEO P.O. Box 630 Salem, S.D. 57058 Telephone (605) 425-2238 FAX: (605) 425-2712

April 19, 1999

HCI

RECEIVED

Bill Bullard, Executive Director South Dakota Public Utilities Commission State Capitol Building 500 East Capitol Ave. Pierre, South Dakota 57501 APR 2 1 1999

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

RE: Docket TC99-030 (Implementation Plan for IntraLATA Dialing Parity)

Dear Bill:

Enclosed for filing in the above referenced Docket is the "Implementation Plan for IntraLATA Toll Dialing Parity" of Hanson Communications, Inc. dba McCook Telecom.

Please note that we have indicated a date for sending carrier notification letters that is in advance of the requested plan approval date. We're done this because of certain language in the FCC's March 23rd IntraLATA Dialing Parity Order, FCC 99-54, which indicates that LECs must implement intraLATA dialing parity within 30 days after approval of their implementation plan. This would seem to mean that the actual conversion to dialing parity should be accomplished within 30 days after this Commission approves the plan. Given this very short timeline, if LECs are not able to start the carrier notification process in advance of final Commission action on the plan, almost no time would be left for notifying and receiving responses from customers.

We are therefore, along with requesting approval of this filed plan, asking that the Commission grant us approval in advance of its final action on the plan to send out carrier notification letters. A sample copy of the carrier notification letter proposed for use is attached to the implementation plan as Appendix A. A sample copy of the proposed carrier participation form to be used is included with the plan as Appendix B.

If Commission Staff or the Commissioners desire any additional information to supplement this filing, please advise.

Thank you for your assistance in filing and distributing these docur ents.

Sincerely,

Bryan K. Roth CEO

Eaclosure

IMPLEMENTATION PLAN FOR INTRALATA TOLL DIALING PARITY

Hanson Communications, Inc. dba McCook Telecom submits this Implementation Plan for IntraLATA Toll Dialing Parity (hereinafter referenced as "the Plan") pursuant to 47 C.F.R. § 51.213 and recent Orders of the South Dakota Public Utilities Commission (hereinafter referenced as the "Commission") which require this filing on or before April 22, 1999. The purpose of the Plan is to provide information to the Commission concerning how and when Hanson Communications, Inc. dba McCook Telecom will convert to intraLATA toll dialing parity, or, as it is sometimes called, intraLATA equal access. The provisioning of such capability will permit customers to select which long distance carrier they want to handle their intraLATA 1+ calls.

1. Company name and address:

Hanson Communications, Inc. dba McCook Telecom PO Box 630 Salem, SD 57058-0630 Telephone: 605-425-2238 Fax: 605-425-2712

2. Associated LATA:

Hanson Communications, Inc. dba McCook Telecom is located in and for purposes of this Plan associates with LATA 605.

3. Description of offering

Hanson Communications, Inc. dba McCook Telecom will offer intraLATA toll dialing parity through the "full 2-PIC" presubscription software installed on a centralized basis at the access tandem switch of South Dakota Network, Inc. ("SDN"). The "full 2-PIC" method of presubscription allows a customer to presubscribe to one long distance carrier for all 1+ intraLATA toll calls and to presubscribe to the same or another long distance carrier for all 1+ interLATA toll calls. Because the intraLATA toll dialing parity capability will be provisioned via SDN at 2900 West 10th, Sioux Falls, SD 57104, interconnection and access necessary for participation in the offering may be ordered by long distance carriers via SDN.

4. Included local exchange areas and conversion date.

IntraLATA toll dialing parity through SDN will be made available in the following local exchange areas beginning July 22, 1999:

Salem 605-425

5. Interexchange carrier "carrier" notification.

All carriers certified in South Dakota to provide long distance services will be notified by June 1, 1999, of the conversion to intraLATA toll dialing parity (a sample copy of the carrier notification letter to be used is attached hereto as Appendix A). These carriers will be asked to respond by June 16, 1999, if they want to participate in the intraLATA toll presubscription process (a sample copy of the form which carriers will complete to indicate their participation in the presubscription process is attached hereto as Appendix B). For those carriers that choose to participate in the presubscription process, information regarding customer choices will be forwarded by the local exchange carrier to the participating carriers through the "Customer Account Record Exchange" ("CARE") process in place today for exchanging information regarding interLATA toll selections. The CARE process allows for a regular reporting via magnetic tape or facsimile transmission of customer carrier selections between local exchange carriers and long distance carriers.

Hanson Communications, Inc. dba McCook Telecom will also provide a summary report that will list all carrier selections received for the long distance carrier for whom the report is prepared. This report will be mailed to each participating long distance carrier in advance of the intraLATA dialing parity implementation date.

Hanson Ccmmunications, Inc. dba McCook Telecom will make available preconversion customer name and address lists. These customer lists are available to assist participating carriers in their presubscription solicitation efforts. These lists may be provided subject to a reasonable non-discriminatory fee, with delivery contingent upon the carrier meeting all requirements for participation in the intraLATA presubscription process.

6. Customer notification

A. Current customers.

Customers will be notified of the conversion to intraLATA toll dialing parity by letter postmarked by no later than June 25, 1999. In such letter, customers will be advised of their intraLATA choices. Customers will be given the option to remain with their existing intraLATA 1+ carrier, Express Communications, Inc., or to choose a different intraLATA carrier for their 1 · service. The letter will include a list indicating all carriers in addition to the existing 1+ carrier that have chosen to participate in the intraLATA toll presubscription process (a sample copy of the customer notification letter that will be used is attached hereto as Appendix C).

Hanson Communications, Inc. dba McCook Telecom will include with the customer notification letter a customer response form (a sample copy of the customer response form to be used is attached hereto as Appendix D). Customers will be advised that if they choose a carrier other than their existing intraLATA 1+ carrier, they must fill out and return the response form postmarked by July 12, 1999. Those customers choosing to stay with their existing intraLATA 1+ carrier, will not have to return the response form. Their intraLATA 1+ service will remain with their current provider. Based on the customer response forms received and any letters of

agency received directly from participating carriers, Hanson Communications, Inc. dba McCook Telecom, as of the date and time that intraLATA dialing parity is implemented, will execute all necessary carrier selection changes.

Customers will not be charged for making any change to their intraLATA 1+ carrier during the presubscription process. In addition, customers will be advised that they will be given 60 days after the intraLATA toll dialing parity implementation date to change their intraLATA 1+ carrier at no charge.

B. New customers.

New customers to Hanson Communications, Inc. dba McCook Telecom's local exchange service, commencing such service after June 25, 1999, will be asked to choose both an intraLATA and interLATA carrier. They will be informed that regulations require that they choose a carrier for their intraLATA 1+ service (for calls within this LATA) and also choose a carrier for their interLATA 1+ service (for calls going outside this LATA). Hanson Communications, Inc. dba McCook Telecom will either inform or provide new customers a list of all carriers participating in intraLATA 1+ services and all carriers participating in interLATA 1+ service representatives of Hanson Communications, Inc. dba McCook Telecom will reference the names of all carriers in the customer's exchange area providing 1+ toll service. If the customer requests, the customer service representative will provide contact telephone numbers for the available carriers. Lists used by the customer service representatives will contain carriers' names in random order.

Customers applying for service will be encouraged to make a carrier selection. New customers will make an affirmative selection before they will be assigned to any carrier for either their intraLATA 1+ or interLATA 1+ service. New customers will be advised that neither intraLATA 1+ dialed calls or interLATA 1+ dialed calls originated from the customer's local line will be possible until a carrier selection is made Until a selection is made, non-selecting customers will need to dial a carrier access code to make either intraLATA or interLATA toll calls.

7. Request for approval of Plan.

Hanson Communications, Inc. dba McCook Telecom asks that the Commission grant its official approval of this Plan no earlier than June 22, 1999

Dated this 19th day of April, 1999.

Respectfully submitted,

Bryan K. Roth, CEO Hanson Communications, Inc. dba McCook Telecom

3

Hanson Communications, Inc. dba McCook Telecom IntraLATA Dialing Parity Timeline

Carrier notifications completed by: June 1, 1999

Carrier responses due by: June 16, 1999

Customer notification completed by: June 25, 1999

Due date for customer response forms: July 12, 1999

IntraLATA dialing parity implementation date: July 22, 1999

End of 60 day grace period: September 20, 1999

APPENDIX A

Date

TO: All Long Distance Carriers of Record in the State of South Dakota

Hanson Communications, Inc. dba McCook Telecom is pleased to announce the provisioning of IntraLATA equal access in certain local exchange areas. A list of these exchanges is attached. This service will be made available to customers on July 22, 1999.

It is Hanson Communications, Inc. dba McCook Telecom's intent to work closely with all users of access and maintain an impartial position with regard to the end user's selection of an IntraLATA long distance carrier. Hanson Communication, Inc. dba McCook Telecom will supply a PIC list for the end user's selection of an IntraLATA long distance carrier. However, because IntraLATA equal access will be provisioned via South Dakota Network (SDN) at 2900 West 10th Street, Sioux Falls, SD 57104, interconnection and access may be ordered via SDN.

Please complete and return the attached form if you wish to be a carrier of choice on the IntraLATA equal access PIC list for the exchanges listed on the next page.

Questions may be directed to Linda Bjerke at (605-425-2238).

You must return your request for participation postmarked no later than June 16, 1999, to:

Linda Bjerke Hanson Communications, Inc. dba McCook Telecom PO Box 630 Salem, SD 57058-0630 Fax # 605-425-2712

Sincerely,

Bryan K. Roth, CEO

cc: Bill Bullard, South Dakota Public Utilities Commission

Hanson Communications, Inc. dba McCook Telecom exchanges to provide IntraLATA equal access:

TOWN	NPA	NXX
Salem	605	425
	ab in the set of nick in the second	

APPENDIX B

INTRALATA PIC LIST PARTICIPATION FORM FOR HANSON COMMUNICATIONS, INC. DBA MCCOOK TELECOM

CARRIER NAME	
ACNA	
CIC	
BILLING ADDRESS	
BILLING CONTACT	
PHONE NUMBER	
FAX NUMBER	
E-MAIL ADDRESS	
CUSTOMER SERVICE NUMBER (BUSINESS)	
CUSTOMER SERVICE NUMBER (RESIDENCE)	
WOULD YOU LIKE TO BE INCLUDED ON THE INTRALATA PIC LIST?	YES
SIGNATURE	
TITLE	
DATE	

Please respond by June 16, 1999.

Linda Bjerke Hanson Communications, Inc. dba McCook Telecom PO Box 630 Salem, SD 57058-0630

APPENDIX C

Date:

To: All Customers of

Hanson Communications, Inc. dba McCook Telecom

Hanson Communications, Inc. dba McCook Telecom is pleased to announce that effective July 22, 1999, we will be make it possible for you to choose from various long distance companies for your in-state 1+long distance service (intraLATA long distance service). This service includes all of your intrastate long distance calls made by dialing 1 plus area code and local telephone number. With these changes, you will have the ability to select a long distance company for your in-state i+long distance service.

In conjunction with making these changes, Hanson Communications, Inc. dba McCook Telecom is asking all of its local exchange subscribers to choose whether they wish to retain the current long distance company providing their in-state 1+ long distance service or select another company for the service.

Currently Express Communications, Inc. provides your in-state 1+ long distance service. This company will continue to provide service to you unless you tell us to make a change and select another carrier. If you do nothing, your in-state 1+ long distance service will remain with Express Communications, Inc.

Attached is a list of long distance companies, in addition to Express Communications, Inc., that have agreed to provide 1+ in-state long distance services in your area. If you would like one of these other companies to provide your service, please complete the customer response form that is also attached and return it to our business office postmarked by no later than July 12, 1999.

You will not be charged for making a change to your existing in-state 1+ long distance service in response to this notice. In addition, for a period of 60 days after July 22, 1999, you may decide to change your in-state 1+ long distance carrier, one time, at no charge. After September 20, 1999, you will incur a Primary Interexchange Carrier (PIC) charge of \$5.00 for changing carriers.

Please call our office at 611 if you have any questions on this matter.

Sincerely,

Hanson Communications, Inc. dba McCook Telecom

LIST

Listed below are the other Long Distance companies that are willing to offer you IntraLATA 1+ (generally in-state) long distance services. If you wish to change your intraLATA 1+ long distance carrier, please complete the attached form and return it postmarked by July 12, 1999, to McCook Telecom, PO Box 630, Salem, SD, 57058.

ABC Telephone Company, Inc Bus/Res: 1-800-555-1234

LMNOP Telecommunications Bus: 1-800-555-2345

ZXC Telephone Company Bus/Res: 1-800-555-3456

Please respond on or before July 12, 1999.

to			
to to	40-11 J 1-1-1-1		
to			
lo		 	
to	1		
to			

X Date (Required)

In-State 1+ Long Distance Service (IntraLATA Long Distance Service) Customer Response Form

(Please print)

Subscriber Billing Name

Billing Address

(City, State, Zip)

Please change my long distance company for in-state (IntraLATA) 1+ long distance calls:

Telephone Number(s)

I authorize McCook Telecom to make the above carrier change(s). I understand that only one carrier may be designated as my intraLATA or in-state preferred interexchange carrier (PIC) for any one telephone number.

X Subscriber's Signature (Required)

NOTE: You do not need to return this form if you wish to retain your current intraLATA or 1+ in-state long distance carrier, Express Communications, Inc.

Carrier Name

APPENDIX D

TELEC CONSULTING RESOURCES &

RECEIVED

APR 21 1999

April 20, 1999

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION Omaha, NE 68114-2508 (402) 398-0062 FAX (402) 398-0065

909 N. 96th Street, Suite 203

301 S. 13th Street, Suite 401 Lincoln, NE 68508 (402) 441-4315 FAX (402) 441-4317

P.O. Box 858, 1509 Sylvan Circle Brandon, SD 57005-0858 (605) 582-2020 FAX (605) 582-2021

Mr. Bill Bullard, Executive Director South Dakota Public Utilities Commission State Capitol Building 500 East Capitol Avenue Pierre, South Dakota 57501

RE: Docket TC99-030/Implementation Plan for IntraLATA Dialing Parity

Dear Mr. Bullard:

On behalf of our client, Jefferson Telephone Company (Jefferson), we are enclosing its intraLATA toll dialing parity implementation plan. Please file this plan in the above referenced docket.

We have indicated a carrier notification date in advance of the requested plan approval date. This was necessitated by the extremely short time frames in the FCC's March 23 IntraLATA Dialing Parity Order, FCC 99-54. Language in this order would suggest that local exchange companies (LECs) must implement intraLATA dialing parity within thirty days after Commission approval of the LEC implementation plan. A month is not adequate time to notify carriers and customers of the conversion to intraLATA dialing parity. Customer service and fairness to interexchange carriers demand more than thirty days' time; therefore, we are requesting that the Commission approve our plan to send out carrier notifications in advance of approving the entire plan.

We have included in this plan a description of Jefferson's offering, conversion details, copies of the carrier notification and customer notification, a time-line, and a copy of Jefferson's service catalog.

Please give Loretta Calabro or me a call at (402)398-0062 with any questions you may have on this filing.

Thank you.

Sincerely,

enc.

cc: Tom Connors, Jefferson Telephone Company

JEFFERSON TELEPHONE COMPANY INTRALATA DIALING PARITY IMPLEMENTATION PLAN

Jefferson Telephone Company submits this implementation plan for intraLATA dialing parity (the Plan) pursuant to 47 C.F.R. 51.213, FCC Order 99-54, and South Dakota Public Utilities Commission (Commission) Docket TC99-030. The purpose of the Plan is to provide information to the Commission on how and when Jefferson Telephone Company (Jefferson) will convert to intraLATA dialing parity, or, as it is sometimes called, intraLATA equal access. The provisioning of this capability will allow customers to select whichever long distance carrier they want to handle their intraLATA 1+ calls.

1. Company name and address:

Jefferson Telephone Company 311 Main Street P.O. Box 128 Jefferson, SD 57038-0128

2. Associated LATA:

South Dakota LATA, LATA 640

3. Description of offering:

Jefferson Telephone Company will offer intraLATA dialing parity through the full 2-PIC presubscription software installed on a centralized basis at the access tandem switch of South Dakota Network, Inc. (SDN). The full 2-PIC method of presubscription allows a customer to presubscibe to one long distance carrier for all 1+ intraLATA toll calls and to presubscribe to the same or to another long distance carrier for all 1+ interLATA toll calls. Because the intraLATA dialing parity capability will be provisioned via SDN at 2900 West 10th, Sioux Falls, SD 57104, interconnection and access necessary for participation in the offering may be ordered by long distance carriers via SDN.

4. Included local exchange area and conversion date:

IntraLATA toll dialing parity through SDN will be available in the following local exchange area beginning July 15, 1999:

Exchange	NPA	NXX
Jefferson, South Dakota	(605)	966

Interexchange carrier (carrier) notification

All carriers certified in South Dakota to provide long distance services will be notified by May 10, 1999, of the conversion to intraLATA toll dialing parity. (Please see Attachment A.) These carriers will be asked to respond by June 7, 1999, if they want to participate in the intraLATA toll presubsciption process. (See Attachment B.) For those carriers that choose to participate in the presubscription process, information regarding customer choices will be forwarded by Jefferson Telephone Company to the participating carriers through the "Customer Account Record Exchange" (CARE) process that is already in place. CARE currently serves as the vehicle for the exchange of information regarding interLATA toll selections.

Jefferson Telephone Company will make available, upon request, preconversion customer name and address lists to participating carriers that meet all requirements for participation in the intraLATA presubsciption process.

6. Customer notification

A. Current customers:

Customers will be notified of the conversion to intraLATA toll dialing parity by letter by June 25, 1999. (Please see Attachment C.) Included in this letter will be a list of participating carriers. In the letter, customers will be advised that they may remain with their existing intraLATA 1+ carrier or choose a different carrier from the list of participating carriers. Enclosed with the customer notification letter will be customer response form. (See Attachment D). Customers will be advised to fill out and return the response form if they choose a carrier other than their existing carrier, those customers choosing to stay with their existing carrier need not fill out and return the form. Based on the customer response forms and any letters of agency received directly from participating carriers, Jefferson Telephone Company will execute all necessary carrier selection changes as of July 15, 1999. Customers will not be charged for making any change to their intraLATA 1+ carrier selection during the presubscription process. In addition, customers will be advised that they will be given a 60 day grace period after the implementation date to change their intraLATA 1+ carrier, one time, at no charge. After the 60 day grace period, a one-time \$5.00 charge will apply to such a change, just as it does today for making an interLATA 1+ carrier change.

B. New customers:

New customers applying for local service from Jefferson Telephone Company after June 15, 1999, will be asked to choose both an interLATA and intraLATA carrier. They will be advised that this may or may not be the same carrier and will choose from the respective lists of participating carriers. Lists used by customer service representatives will contain participating carriers' names in random order. Upon customer request, customer service representatives will provide contact telephone numbers for customers to use in contacting carriers. Customers applying for service will be encouraged to make carrier selections and will be advised that neither intraLATA 1+ nor interLATA 1+ calls can be made form their local line until selections are made. Until selections are made, customers will have to dial a carrier access code to make 1+ calls.

7. Requist for approval of plan

Jefferson Telephone Company asks that the Commission grant its official approval of this plan no earlier than June 15, 1999.

Dated this 20th day of April, 1999.

Respectfully submitted,

Lee Darrington

TELEC Consulting Resources, Inc. on behalf of Jefferson Telephone Company

JEFFERSON TELEPHONE COMPANY INTRALATA DIALING PARITY TIMELINE

Carrier notification completed by:	May 10, 1999
Carrier response due by:	June 7, 1999
Customer notification completed by:	June 15, 1999
Customer response due:	July 10, 1999
IntraLATA dialing parity implementation date:	July 15, 1999
End of 60 day grace period:	September 13, 1999

ATTACHMENT A

INTEREXCHANGE CARRIER NOTICE

May 10, 1999

All Long Distance Carriers of Record State of South Dakota

Dear Sir or Madam:

Jefferson Telephone Company (Jefferson) is pleased to announce the provisioning of intraLATA equal access in its local exchange area of Jefferson, South Dakota. This service will be available on July 15, 1999. Jefferron, South Dakota's NPA is (605), its NXX is 966, and it is part of LATA 640.

Because intraLATA equal access will be provisioned via South Dakota Network (SDN), interconnection and access should be ordered via SDN at 2900 W. 10th St.; Sioux Falls, SD 57104. SDN's telephone number is (605)334-7185. Information regarding customers that choose you as their intraLATA carrier will be forwarded to you via the existing CARE process.

Please complete and return the enclosed response form by June 7, 1999, if you want to be a carrier of choice on the intraLATA equal access PIC list for Jefferson, South Dakota.

Questions may be directed to me at (605)966-5631.

Yours truly,

Tom Connors Manager

ATTACHMENT B INTRALATA PIC LIST PARTICIPATION FORM JEFFERSON TELEPHONE COMPANY JEFFERSON, SOUTH DAKOTA

Carrier name:					
ACNA:					
CIC:					
Billing address:					
Billing contact:		10			
Telephone number:					
FAX number:					
E-mail address:					
Customer service #: (Business)					
Customer service #:					
Include on intraLATA	PIC list?		YES	NO	
Signature					

Title

Date

Jefferson Telephone Company P.O. Box 128 Jefferson, SD 57038-0128 Tel.: (605)966-5631 Fax: (605)966-5340 RESPOND BY JUNE 7, 1999

ATTACHMENT C

CUSTOMER NOTICE AND CARRIER LIST

June 15, 1999

Jefferson Telephone Company Customer

Dear Customer.

Currently, Express Communications provides you with 1+ long distance service within the South Dakota calling area. Jefferson Telephone Company will be making changes effective July 15, 1999, that will allow you to choose a different 1+ provider of long distance service for calls within the state. We are including in this mailing a list of participating long distance companies that you may choose from.

We will make no change in your service unless you tell us to do so. If you wish to choose a different long distance carrier for calls to points within the state, please fill out the enclosed response form and mail or bring it to our office by July 10, 1999. If you do nothing, Express Communications will remain your intrastate long distance provider, just as it is today.

Whether or not you make a choice now, there is a 60 day grace period during which time you may decide to change your intraLATA carrier, one time, at no charge. After September 13, 1999, you will incur a \$5.00 charge for changing carriers.

Please call our office at (605)966-5631 if you have any questions on this matter.

Sincerely,

Jefferson Telephone Company

LIST OF PARTICIPATING LONG DISTANCE CARRIERS

ABC Long Distance (xxx)xxx-xxxx (Business) (xxx)xxx-xxxx (Residence)

DEF Long Distance (xxx)xxx-xxxx (Bus/Res)

ETC, ETC, ETC

ATTACHMENT D

JEFFERSON TELEPHONE COMPANY IN-STATE 1+ LONG DISTANCE (INTRALATA LONG DISTANCE SERVICE) CUSTOMER RESPONSE FORM

Please Print	
Billing Name:	·····
Billing Address:	
Please change my l	long distance company for in-state (intraLATA) 1+ calling.

Telephone Number(s)

Carrier Name

Signature (Required)

Date (Required)

NOTE: DO NOT RETURN THIS FORM IF YOU WISH TO RETAIN YOUR CURRENT INTRALATA LONG DISTANCE CARRIER, EXPRESS COMMUNICATIONS.

Jefferson Telephone Company Local Exchange Service Catalog

SERVICES AND APPLICATION OF RATES AND CHARGES

Miscellaneous Services

Presubscription

A. Presubscription is the process by which end user customers may select and designate to the Company an interexchange carrier to place, without any special codes, their interLATA and intraLATA calls.

B. An end user may select a primary interexchange carrier for all of its lines, or it may indicate a different interexchange carrier for each of its lines. Only one interLATA and intraLATA carrier may be selected for each line terminating in the same hunt group.

C. After the end user's initial selection of an interLATA and intraLATA carrier or the designation that they do not want to presubscribe to any interexchange carrier, the end user will be charged for any change in selection after the grace period associated with the conversion to Equal Access. This nonrecurring charge will be billed to the end user who is the subscriber to the Local Exchange Access Service. It is in addition to the interstate presubscription charge.

D. In the event the end user is incorrectly presubscribed, due to misassignment on the part of the Company, no charge shall apply.

E. In the event an end user is incorrectly presubscribed due to misassignment on the part of the interexchange carrier, and the interexchange carrier is unable to document such an assignment, the Company will apply the charge to the responsible interexchange carrier and assign the end user to an interexchange carrier of the end user's choice.

Effective: July 15, 1999

(N)

(N)

Jefferson Telephone Company Local Exchange Service Catalog

RATE LIST

Presubscribed Interexchange Carrier (PIC) Change Charge-Intrastate

\$ 5.00/line

Issued: June 15, 1999

Effective: July 15, 1999

(N)



GOLDEN WEST COMMUNICATIONS, INC.

HEADOLIARTERS OFFICE P.O. BOX 411 Wall, South Dakota 57790-0411 Phone: 605/279-2020 Fax: 605/279-2721

DISTRICT BRWICH OFFICE P.O. BOX 392 Hat Springs, South Datiots 57747-0092 Phone: 605/745-5534 Fax: 605/745-5531

April 20, 1999

Bill Bullard, Executive Director South Dakota Public Utilities Commission State Capitol Building 500 East Capitol Ave. Pierre, South Dakota 57501

RE: Docket TC99-030 (Implementation Plan for IntraLATA Dialing Parity)

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

RECEIVED

Dear Bill:

Vivian Telephone Company d.b.a. Golden West Communications, Inc. Enclosed for filing in the above referenced Docket are the "Implementation Plans for IntraLATA Toll Dialing Parity" of

approval dute. We've done this because of certain language in the FCC's March 23rd IntraLATA Dialing Parity Order, FCC 99-54, which indicates that LECs must implement intraLATA dialing parity within 30 days after approval of their implementation plan. This would seem to mean that the actual conversion to dialing parity should be accomplished within 30 days after this Commission approves the plan. Given this very short timeline, if LECs are not able to start the carrier receiving responses from customers. Please note that we have indicated a date for scading carrier notification letters that is in advance of the requested plan fication process in advance of final Commission action on the plan, almost no time would be left for notifying and

We are therefore, along with requesting approval of this filed plan, whing that the Commission grant us approval in advance of its final action on the plan to send out carrier notification letters. A sample copy of the carrier notification letter proposed for use is attached to the implementation plan as Appendix A. A sample copy of the proposed carrier participation form to be red is included with the plan as Appendix B

If Comm ion Staff or the Commissioners desire any additional information to supplement this filing, please advise

Thank you for your assistance in filing and distributing these documents

Sincerely,

Sel Vest Co ons, inc

hick Brow. , Management Consultant

E.

RECEIVED

APR 2 1 1999

IMPLEMENTATION PLAN FOR INTRALATA TOLL DIALING PARITY

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

Vivian Telephone Company d.b.a. Golden West Communications, Inc. submits this Implementation Plan for IntraLATA Toll Dialing Parity (hereinafter referenced as "the Plan") pursuant to 47 C.F.R. § 51.213 and recent Orders of the South Dakota Public Utilities Commission (hereinafter referenced as the "Commission") which require this filing on or before April 22, 1999. The purpose of the Plan is to provide information to the Commission concerning how and when Golden West Communications, Inc. will convert to intraLATA toll dialing parity, or, as it is sometimes called, intraLATA equal access. The provisioning of such capability will permit customers to select which long distance carrier they want to handle their intraLATA 1+ calls.

1. Company name and address:

Golden West Communications, Inc. 410 Crown Street, PO Box 411 Wall, SD 57790-0411 Tele: 605-279-2161 Fax: 605-279-2727

2 Associated LATA:

Golden West Communications, Inc. is located in and for purposes of this Plan associates with LATA 605.

3. Description of offering.

Golden West Communications, Inc. will offer intraLATA toll dialing parity through the "full 2-PIC" presubscription software installed on a centralized basis at the access tandem switch of South Dakota Network, Inc. ("SDN"). The "full 2-PIC" method of presubscription allows a customer to presubscribe to one long distance carrier for all 1+ intraLATA toll calls and to presubscribe to the same or another long distance carrier for all 1+ interLATA toll calls. Because the intraLATA toll dialing parity capability will be provisioned via SDN at 2900 West 10th, Sioux Falls, SD 57104, interconnection and access necessary for participation in the offering may be ordered by long distance carriers via SDN. 4. Included local exchange areas and conversion date.

IntraLATA toll dialing parity through SDN will be made available in the following local exchange areas beginning July 22, 1999:

Exchange	NPA/NXX
So. Bonesteel, NE	402(653)
So. Burke, NE	402(774)
Gregory, NE	402(974)
Avon, SD	605(286)
Springfield, SD	605(369)
Menno, SD	605(387)
Reliance, SD	605(473)
Clearfield, SD	605(557)
Scotland, SD	605(583)
Bonesteel, SD	605(654)
Murdo, SD	605(669)
Custer, SD	605(673)
Vivian, SD	605(683)
Rosebud, SD	605(747)
Burke, SD	605(775)
Gregory, SD	605(835)
Winner, SD	605(842)
Mission, SD	605(856)
Witten, SD	605(879)
Freeman, SD	605(925)

5. Interexchange carrier "carrier" notification.

All carriers certified in South Dakota to provide long distance services will be notified by June 1, 1999, of the conversion to intraLATA toll dialing parity (a sample copy of the carrier notification letter to be used is attached hereto as Appendix A). These carriers will be asked to respond by June 16, 1999, if they want to participate in the intraLATA toll presubscription process (a sample copy of the form which carriers will complete to indicate their participation in the presubscription process is attached hereto as Appendix B). For those carriers that choose to participate in the presubscription process, information regarding customer choices will be forwarded by the local exchange carrier to the participating carriers through the "Customer Account Record Exchange" ("CARE") process in place today for exchanging information regarding interLATA toll selections. The CARE process allows for a regular reporting via magnetic tape or facsimile transmission of customer carrier selections between local exchange carriers and long distance carriers.

Golden West Communications, Inc. will also provide a summary report that will list all carrier selections received for the long distance carrier for whom the report is prepared. This report will be mailed, at the participating long distance carriers request, in advance of the intraLATA dialing parity implementation date. Golden West Communications, Inc. will make available preconversion customer nome and address lists. These customer lists are available to assist participating carriers in their presubscription solicitation efforts. These lists may be provided subject to a reasonable, non-discriminatory fee, with delivery contingent upon the carrier meeting all requirements for participation in the intraLATA presubscription process.

6. Customer notification.

A. Current customers.

Customers will be notified of the conversion to intraLATA toll dialing parity by letter postmarked by no later than June 25, 1999. In such letter, customers will be advised of their intraLATA choices. Customers will be given the option to remain with their existing intraLATA 1+ carrier, Golden West Long Distance, or to choose a different intraLATA carrier for their 1+ service. The letter will include a list indicating all carriers in addition to the existing 1+ carrier that have chosen to participate in the intraLATA toll presubscription process (a sample copy of the customer notification letter that will be used is attached hereto as Appendix C).

Golden West Communications, Inc. will include with the customer notification letter a customer response form (a sample copy of the customer response form to be used is attached hereto as Appendix D). Customers will be advised that if they choose a carrier other than their existing intraLATA 1+ carrier, they must fill out and return the response form postmarked by July 12, 1999. Those customers choosing to 1 tay with their existing intraLATA 1+ carrier, will not have to return the response form. Their intraLATA 1+ service will remain with their current provider. Based on the customer response forms received and any letters of agency received directly from participating carriers, Golden West Communications, Inc., as of the date and time that intraLATA dialing parity is implemented, will execute all necessary carrier selection changes.

Customers will not be charged for making any change to their intraLATA 1+ carrier during the presubscription process. In addition, customers will be advised that they will be given 60 days after the intraLATA toll dialing parity implementation date to change their intraLATA 1+ carrier at no charge.

B. New customers.

New customers to Golden West Communications, Inc.'s local exchange service, commencing such service after conversion, will be asked to choose both an intraLATA and interLATA carrier. They will be informed that regulations require that they choose a carrier for their intraLATA 1+ service (for calls within this LATA) and also choose a carrier for their interLATA 1+ service (for calls going outside this LATA). Golden West Communications, Inc. will either inform or provide new customers a list of all carriers participating in intraLATA 1+ services and all carriers participating in interLATA 1+ services. Customer service representatives of Golden West Communications, Inc. will randomly reference the names of all carriers in the customer's exchange area providing 1+ toll service. If the customer requests, the customer service representative will provide contact telephone numbers for the available carriers. Lists used by the customer service representatives will contain carriers' names in random order.

Customers applying for service will be encouraged to make a carrier selection. New customers will make an affirmative selection before they will be assigned to any carrier for either their intraLATA 1+ or interLATA 1+ service. New customers will be advised that neither intraLATA 1+ dialed calls or interLATA 1+ dialed calls originated from the customer's local line will be possible until a carrier selection is made. Until a selection is made, non-selecting customers will need to dial a carrier access code to make either intraLATA or interLATA toll calls.

7. Request for approval of Plan.

Golden West Communications, Inc. asks that the Commission grant its official approval of this Plan no earlier than June 22, 1999.

Dated this 20th day of April, 1999.

Respectfully submitted,

Jack Brown, Management Consultant Golden West Communications, Inc.

Golden West Communications, Inc. IntraLATA Dialing Parity Timeline

Carrier notifications completed by: June 1, 1999

Carrier responses due by: June 16, 1999

Customer notification completed by: June 25, 1999

Due date for customer response forms: July 12, 1999

IntraLATA dialing parity implementation date: July 22, 1999

End of 60 day grace period: September 20, 1999

APPENDIX A

Date: June 1, 1999

TO: All Long Distance Carriers of Record in the State of South Dakota

Golden West Communications, Inc. (GWC) is pleased to announce the provisioning of IntraLATA equal access in certain local exchange areas. A list of these exchanges is attached. This service will be made available to customers on July 22, 1999.

It is GWC's intent to work closely with all users of access and maintain an impartial position with regard to the end user's selection of an IntraLATA long distance carrier. GWC will supply a PIC list for the end user's selection of an IntraLATA long distance carrier. However, because IstraLATA equal access will be provisioned via South Dakota Network (SDN) at 2900 West 10th Street, Sioux Falls, SD 57104, interconnection and access may be ordered via SDN.

Please complete and return the attached form if you wish to be a carrier of choice on the IntraLATA equal access PIC list for the exchanges listed on the next page.

Questions may be directed to Janice Christensen, Equal Access Coordinator at 605-996-9646. Technical questions should be directed to Greg Goddicksen, Inside Plant Supervisor at 605-745-3103.

You must return your request for participation postmarked no later than June 16, 1999, to:

Janice Christensen, Equal Access Coordinator Golden West Communications, Inc. 1515 North Sanborn Boulevard Mitchell, SD 57301-1021 Tele # 605-996-9646 Fax # 605-995-2577

Sincerely,

Jack Brown, Management Consultant Golden West Communications, Inc.

cc: Bill Bullard, South Dakota Public Utilities Commission

Golden West Communications, Inc. exchanges to provide IntraLATA equal access:

TOWN	NPA	NXX
So. Bonesteel, NE	402	653
So. Burke NE	402	774
Gregory, NE	402	974
Avon, SD	605	286
Springfield, SD	605	369
Meano, SD	605	387
Reliance, SD	605	473
Clearfield, SD	605	557
Scotland, SD	605	583
Bonesteel, SD	605	654
Murdo, SD	605	669
Custer, SD	605	673
Vivian, SD	605	683
Rosebud, SD	605	747
Burke, SD	605	775
Gregory, SD	605	835
Winner, SD	605	842
Mission, SD	605	856
Witten, SD	605	879
Freeman, SD	605	925

7

APPENDIX B

INTRALATA PIC LIST PARTICIPATION FORM FOR GOLDEN WEST COMMUNICATIONS, INC.

CARRIER NAME	
ACNA	
CIC	
BILLING ADDRESS	
BILLING CONTACT	
PHONE NUMBER	
FAX NUMBER	
E-MAIL ADDRESS	
CUSTOMER SERVICE NUMBER (BUSINESS)	
CUSTOMER SERVICE NUMBER (RESIDENCE)	
WOULD YOU LIKE TO BE INCLUDED ON THE INTRALATA PIC LIST?	YES
SIGNATURE	
TITLE	
DATE	

Please respond by June 16, 1999.

Address:

Janice Christensen, Equal Access Coordinator Golden West Communications, Inc. 1515 North Sanborn Boulevard Mitchell, SD 57301-1021 Fax # 605-995-2577

APPENDIX C

Date: June 25, 1999

To: All Customers of Golden West Communications, Inc.

Golden West Communications, Inc. is pleased to announce that effective July 22, 1999, we will make it possible for you to choose from various long distance companies for your in-state 1+ long distance service (intraLATA long distance service). This service includes all of your intrastate long distance calls made by dialing 1 plus the area code and local telephone number. With these changes, you will have the ability to select a long distance company for your in-state 1+ long distance service.

In conjunction with making these changes, Golden West Communications, Inc. is asking all of its local exchange subscribers to choose whether they wish to retain the current long distance company providing their in-state 1+ long distance service or select another company for the service.

Currently Golden West Long Distance provides your in-state 1+ long distance service. This company will continue to provide service to you unless you tell us to make a change and select another carrier. If you do nothing, your in-state 1+ long distance service will remain with Golden West Long Distance.

Attached is a list of long distance companies, in addition to Golden West Long Distance, that have agreed to provide 1+ in-state long distance services in your area. If you would like one of these other companies to provide your service, please complete the customer response form that is also attached and return it to our business office postmarked by no later than July 12, 1999.

You will not be charged for making a change to your existing in-state 1+ long distance service in response to this notice. In addition, for a period of 60 days after July 22, 1999, you may decide to change your in-state 1+ 'ong distance carrier, one time, at no charge. After September 20, 1999, you will incur a Primary Interexchange Carrier (PIC) charge of \$5.00 for changing carriers.

Please call our office at 605-279-1020 or "811", from a Golden West service area, if you have any questions on this matter.

Sincerely,

Golden West Communications, Inc.

LIST

Listed below are the other Long Distance companies that are willing to offer you IntraLATA 1+ (generally in-state) long distance services. If you wish to change your intraLATA 1+ long distance carrier, please complete the attached form and return it postmarked by July 12, 1999, to Golden West Communications, Inc., 410 Crown Street, PO Box 411, Wall, SD, 57790-0411.

ABC Telephone Company, Inc. Bus/Res: 1-800-555-1234

LMNOP Telecommunications Bus: 1-800-555-2345

ZXC Telephone Company Bus/Res: 1-800-555-3456

Please respond on or before July 12, 1999.

APPENDIX D

Subscriber Billing Name:		
	(Please print)	
Billing Address:		
	(City, State, Zip)	
Please change my long distance co	mpany for in-state (Intra	LATA) 1+ long distance calls
Please change my long distance co	mpany for in-state (Intra	LATA) 1+ long distance calls
	mpany for in-state (Intra	
Please change my long distance co Telephone Number(s)	mpany for in-state (Intra	LATA) 1+ long distance calls Carrier Name
Telephone Number(s)		
	to	
Telephone Number(s)	to	
Telephone Number(s)	to to to	Carrier Name
Telephone Number(s)	to to to to	Carrier Name
Telephone Number(s)	to to to to to	Carrier Name
Telephone Number(s)	to	Carrier Name
Telephone Number(s)	to to to to to	Carrier Name

X Subscriber's Signature (Required)

1

X Date (Required)

NOTE: You do not need to return this form if you wish to retain your current intraLATA or 1+ in-state long distance carrier, Golden West Long Distance.

RECEIVED

APR 21 1999

IMPLEMENTATION PL: N FOR INTRALATA TOLL DIALING PARITY

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

Vivian Telephone Company d.b.a. Golden West Communications, Inc. submits this Implementation Plan for IntraLATA Toll Dialing Parity (hereinafter referenced as "the Plan") pursuant to 47 C.F.R. § 51.213 and recent Orders of the South Dakota Public Utilities Commission (hereinafter referenced as the "Commission") which require this filing on or before April 22, 1999. The purpose of the Plan is to provide information to the Commission concerning how and when Golden West Communications, Inc. will convert to intraLATA toll dialing parity, or, as it is sometimes called, intraLATA equal access. The provisioning of such capability will permit customers to select which long distance carrier they want to handle their intraLATA 1+ calls.

1. Company name and address:

Golden West Communications, Inc. 410 Crown Street, PO Box 411 Wall, SD 57790-0411 Tcle: 605-279-2161 Fax: 605-279-2727

2. Associated LATA:

Golden West Communications, Inc. is located in and for purposes of this Plan associates with LATA 605.

3. Description of offering.

Golden West Communications, Inc. will offer intraLATA toll dialing parity through the deployment of "full 2-PIC" presubscription software at each end office location. The "full 2-PIC" method of presubscription allows a customer to presubscribe to one long distance carrier for all 1+ intraLATA toll calls and to presubscribe to the same or another long distance carrier for all 1+ interLATA toll calls. Interconnection and/or access necessary for participation in the offering may be ordered by long distance carriers directly from Golden West Communications, Inc.

4. Included local exchange areas and conversion date.

IntraLATA toll dialing parity through these software upgrades will be made available in the following local exchange areas beginning July 22, 1999:

Exchange	Area Code	Prefix
Lesterville, SD	605	364
Marion, SD	605	648

1

5. Interexchange carrier "carrier" notification.

All carriers certified in South Dakota to provide long distance services will be notified by June 1, 1999, of the conversion to intraLATA toll dialing parity (a sample copy of the carrier notification letter to be used is attached hereto as Appendix A). These carriers will be asked to respond by June 16, 1999, if they want to participate in the intraLATA toll presubscription process (a sample copy of the form which long distance carriers will have to complete to indicate their participation in the presubscription process is attached hereto as Appendix B). For those carriers that choose to participate in the presubscription process, information regarding customer choices will be forwarded by the local exchange carrier to the participating long distance carriers through the "Customer Account Record Exchange" ("CARE") process in place today for exchanging information regarding interLATA toll selections. The CARE process allows for a regular reporting via magnetic tape or facsimile transmission of customer carrier selections between local exchange carriers and long distance carriers.

Golden West Communications, Inc. will also provide a summary report which lists all carrier selections received for the long distance carrier for whom the report is prepared. This report will be mailed, at the participating long distance carriers request, in advance of the intraLATA dialing parity implementation date.

Golden West Communications, Inc. will make available preconversion customer name and address lists. These customer lists are available to assist participating carriers in their presubscription solicitation efforts. These lists may be provided subject to a reasonable, non-discriminatory fee, with delivery contingent upon the carrier meeting all requirements for participation in the intraLATA presubscription process.

6. Customer notification.

A Current customers.

Customers will be notified of the conversion to intraLATA toll dialing parity by letter postmarked by no later than June 25, 1999. In such letter, customers will be advised of their intraLATA choices. Customers will be given the option to remain with their existing intraLATA 1+ carrier, US WEST COMMUNICATIONS, or to choose a different intraLATA toll carrier for their 1+ service. The letter will include a list indicating all long distance carriers in addition to the existing 1+ carrier that have chosen to participate in the intraLATA toll presubscription process (a sample copy of the letter that will be used is attached hereto as Appendix C).

Golden West Communications, Inc. will include with the customer notification letter a customer response form (a sample copy of the customer response form to be used is attached hereto as Appendix D). Customers will be advised that if they choose a carrier other than their existing intraLATA 1+ carrier, they must fill out and return the response form postmarked by July 12, 1999. Those customers choosing to stay with their existing intraLATA 1+ carrier, will not have to return the response form. Their intraLATA 1+ service will remain with their current carrier. Based on the customer response forms received and any letters of agency received directly from participating carriers, Golden West Communications, Inc., as of the date and time that intraLATA dialing parity is implemented, will make all necessary carrier selection changes.

Customers will not be charged for making any change to their intraLATA 1+ carrier during the presubscription process. In addition, customers will be advised that they will be given 60 days after the intraLATA toll dialing parity implementation date to change their intraLATA 1+ carrier at no charge.

B. New customers.

New customers to Golden West Communications, Inc.'s local exchange service, commencing such service after conversion, will be asked to choose both an intraLATA and interLATA carrier. They will be informed that regulations require that they choose a long distance carrier for their intraLATA 1+ service (for calls within this LATA) and also choose a long distance carrier for their interLATA 1+ service (for calls going outside this LATA). Golden West Communications, Inc. will either inform or provide new customers a list of all carriers participating in intraLATA 1+ services and all carriers participating in interLATA 1+ services. Customer service representatives of Golden West Communications, Inc. will randomly reference the names of all carriers in the customer's exchange area providing 1+ toll service in the customer's exchange area. If the customer requests, the customer service representative will provide contact telephone numbers for the available carriers. Lists used by the customer service representatives will contain carriers' names in random order.

Customers applying for service will be encouraged to make a carrier selection. New customers will make an affirmative selection before they will be assigned to any carrier for either their intraLATA 1+ or interLATA 1+ service. New customers will be advised that neither intraLATA 1+ dialed calls or interLATA 1+ dialed calls originated from the customer's local line will be possible until a carrier selection is made. Until a selection is made, non-selecting customers will need to dial a carrier access code to make either intraLATA or interLATA toll calls.

7. Request for approval of Plan.

Golden West Communications, Inc. asks that the Commission grant its official approval of this Plan no earlier than June 22, 1999.

Dated this 20th day of April, 1999.

Respectfully submitted,

Jack Brown, Management Consultant Golden West Communications, Inc.

3

Golden West Communications, Inc. IntraLATA Dialing Parity Timeline

Carrier notifications completed by: June 1, 1999

Carrier responses due by: June 16, 1999

Customer notification completed by: June 25, 1999

Due date for customer response forms: July 12, 1999

IntraLATA dialing parity implementation date: July 22, 1999

End of 60 day grace period: September 20, 1999

APPENDIX A

5

Date: June 1, 1999

TO: All Long Distance Carriers of Record in the State of South Dakota

Golden West Communications, Inc. (GWC) is pleased to announce the provisioning of IntraLATA equal access in certain local exchange areas. A list of these exchanges is attached. This service will be made available to customers on July 22, 1999.

It is GWC's intent to work closely with all users of access and maintain an impartial position with regard to the end user's selection of an IntraLATA long distance company. GWC will supply a PIC list for the end user's selection of an IntraLATA long distance company. IntraLATA equal access will be provisioned on an end office basis and therefore interconnection and access may be ordered through Golden West Communications, Inc.

Please complete and return the attached form if you wish to be a carrier of choice on the IntraLATA equal access PIC list for the exchanges listed on the next page.

Questions may be directed to Janice Christensen, Equal Access Coordinator at 605-996-9646. Technical questions should be directed to Greg Goddicksen, Inside Plant Supervisor at 605-745-3103.

You must return your request for participation postmarked no later than June 16, 1999, to:

Janice Christensen, Equal Access Coordinator Golden West Communications, Inc. 1515 North Sanborn Boulevard Mitchell, SD 57301-1021 Tele # 605-996-9646 Fax # 605-995-2577

Sincerely,

Jack Brown, Management Consultant Golden West Communications, Inc.

cc: South Dakota Public Utilities Commission

TOWN	NPA	NXX
Lesterville, SD	605	364
Marion, SD	605	648

Golden West Communications, Inc. exchanges to provide IntraLATA equal access:

APPENDIX B

INTRALATA PIC LIST PARTICIPATION FORM FOR GOLDEN WEST COMMUNICATIONS, INC.

CARRIER NAME	
ACNA	
CIC	
BILLING ADDRESS	
BILLING CONTACT	
PHONE NUMBER	
FAX NUMBER	
E-MAIL ADDRESS	
CUSTOMER SERVICE NUMBER (BUSINESS)	
CUSTOMER SERVICE NUMBER (RESIDENCE)	
WOULD YOU LIKE TO BE INCLUDED ON THE INTRALATA PIC LIST?	YES NO
SIGNATURE	
TITLE	
DATE	

Please respond by June 16, 1999.

Address:

Janice Christensen, Equal Access Coordinator Golden West Communications, Inc. 1515 North Sanborn Boulevard Mitchell, SD 57301-1021 Fax # 605-995-2577

7

APPENDIX C

Date: June 25, 1999

To: All Customers of Golden West Communications, Inc.

Golden West Communications, Inc. is pleased to announce that effective July 22, 1999, we will make it possible for you to choose from various long distance companies for your in-state 1+ long distance service (intraLATA long distance service). This service includes all of your intrastate long distance calls made by dialing 1 plus the area code and local telephone number. With these changes, you will have the ability to select the long distance company for your in-state 1+ long distance service.

In conjunction with making these changes, Golden West Communications, Inc. is asking all of its local exchange subscribers to choose whether they wish to retain the current long distance company providing their in-state 1+ long distance service or select another company for the service.

Currently US WEST COMMUNICATIONS provides your in-state 1+ long distance service. This company will continue to provide service to you unless you tell us to make a change and select another carrier. If you do nothing, your in-state 1+ long distance service will remain with US WEST COMMUNICATIONS.

Attached is a list of long distance companies, in addition to US WEST COMMUNICATIONS, that have agreed to provide 1+ in-state long distance services in your area. If you would like one of these other companies to provide your service, please complete the customer response form that is also attached and return it to our business office postmarked by no later than July 12, 1999.

You will not be charged for making a change to your existing in-state 1+ long distance service in response to this notice. In addition, for a period of 60 days after July 22, 1999, you may decide to change your in-state 1+ long distance carrier, one time, at no charge. After September 20, 1999, you will incur a Primary Interexchange Carrier (PIC) charge of \$5.00 for changing carriers.

Please call our office at 605-279-1020 or "811", from a Golden West service area, if you have any questions on this matter.

Sincerely.

Golden West Communications, Inc.

Listed below are the other Long Distance companies that are willing to offer you IntraLATA 1+ (generally in-state) long distance services. If you wish to change your intraLATA 1+ long distance carrier, please complete the attached form and return it postmarked by July 12, 1999, to Golden West Communications, Inc., 410 Crown Street, PO Box 411, Wall, SD, 57790-0411.

ABC Telephone Company, Inc. Bus/Res: 1-800-555-1234

LMNOP Telecommunications Bus: 1-800-555-2345

ZXC Telephone Company Bus/Res: 1-800-555-3456

Please respond on or before July 12, 1999.

APPENDIX D

In-State 1+ Long Distance Service (IntraLATA Long Distance Service) **Customer Response Form**

Subscriber Billing Name: _______(Please print)

Billing Address:

(City, State, Zip)

Please change my long distance company for in-state (IntraLATA) 1+ long distance calls:

Telephone Number(s)

to to to to to to to to 10

I authorize Golden West Communications, Inc. to make the above carrier change(s). I understand that only one carrier may be designated as my intraLATA or in-state preferred interexchange carrier (PIC) for any one telephone number.

X Subscriber's Signature (Required)

X Date (Required)

NOTE: You do not need to return this form if you wish to retain your current intraLATA or 1+ in-state long distance carrier, US WEST COMMUNICATIONS.

Carrier Name



Mt. Rushmore Telephone Company

VIA FEDEREAL EXPRESS

April 21, 1999

Bill Bullard, Executive Director South Dakota Public Utilities Commission State Capitol Building 500 East Capitol Ave. Pierre, South Dakota 57501

RECEIVED

APR 22 1999

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

FAX Received APR 21 1999

RE: Docket TC99-030 (Implementation Plan for IntraLATA Dialing Parity)

Dear Bill:

After with discussions with Hartan Best, and on behalf of Mt. Rushmore Telephone Company, please find enclosed and original and ten (10) copies of our reply to the above-mentioned docket.

Please feel free to contact me if you should have any additional questions.

Respectfully submitted, /

Bruce Manson

Treasurer Mt. Rushmore Telephone Company

enclosures



Helping People Communicate Since 1951

227 South Main Street, P.O. Box 800, Clara City, Minnesota 56222 First and Franklin, Keystone, South Dakota 57751



Mt. Rushmore Telephone Company

April 21, 1999

Bill Bulard, Executive Director South Dakota Public Utilities Commission State Capitol Building 500 East Capitol Ave. Pierre, South Dakota 57501 RECEIVED

APR 22 1999

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

RE: Docket TC99-030 (Implementation Plan for IntraLATA Dialing Parity)

Dear Bill:

Concerning the above referenced docket Mt. Rushmore Telephone Company completed conversion to intraLATA equal access on June 19, 1998. This conversion was in conjunction with end office "rehoming" projects initiated as a result of the purchase of the exchanges from USWEST. The following is a list of end offices and dates when end office equal access was offered to the customers.

Keystone February 24, 1998

The process we used in converting was to inform each carrier that we were converting to intraLATA equal access by letter. Coincident with this correspondence, we visited with USWEST Communications, Inc. ("USWEST") concerning their desire to continue providing intraLATA service to our customers. They indicated a willingness to continue. By default, USWEST was the carrier "picked" to each customer record since that was their carrier immediately prior to conversion.

We informed the customers that they now had the ability to access new carriers for intraLATA toll service and allowed time for them to switch carriers at not cost. This "window" was available for three months.

If Commission Staff or the Commissioners desire any additional information to supplement this filing, please advise.

Sincetarly Bruce Treasurer

Mt. Rushmore Telephone Company



Helping People Communicate Since 1951

227 South Main Street, P.O. Box 800, Clara City, Minnesota 56222 First and Franklin, Keystone, South Dakota 57751

FORTRANDALL 1855 TELEPHONE COMPANY RECEIVED VIA FEDEREAL EXPRESS April 21, 1999 APR 22 1999 Bill Bullard, Executive Director SOUTH DAKOTA PUBLIC South Dakota Public Utilities Commission UTILITIES COMMISSION State Capitol Building 500 East Capitol Ave. FAX Received APR 21 1999 Pierre, South Dakota 57501 RE: Docket TC99-030 (Implementation Plan for IntraLATA Dialing Parity) Dear Bill: After with discussions with Harlan Best, and on behalf of Fort Randall Telephone Company, please find enclosed and original and ten (10) copies of our reply to the above-mentioned docket. Please feel free to contact me if you should have any additional questions. Respectfully submitted Bruge Treasurer Fort Randall Telephone Company enclosures Helping People Communicate Since 1951 227 South Main Street, P.O. Box 800, Clara City, Minnesota 56222 Wagner, South Dakota 57380



TELEPHONE COMPANY

April 21, 1999

Bill Bullard, Executive Director South Dakota Public Utilities Commission State Capitol Building 500 East Capitol Ave. Pierre, South Dakota 57501

RECEIVED

APR 22 1999

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

RE: Docket TC99-030 (Implementation Plan for IntraLATA Dialing Parity)

Dear Bill:

FAX Received APR 21 1999

1.5.5.5

Concerning the above referenced docket Fort Randall Telephone Company completed conversion to intraLATA equal access on June 19, 1998. This conversion was in conjunction with end office "rehoming" projects initiated as a result of the purchase of the exchanges from USWEST. The following is a list of end offices and dates when end office equal access was offered to the customers.

- Hermosa February 15, 1998
- Tyndall June 17, 1998
- Tabor June 17, 1998
- Centerville June 18, 1998
- Viborg June 18, 1998
- Wagner June 19, 1998
- Lake Andes June 19, 1998

The process we used in converting was to inform each carrier that we were converting to intraLATA equal access by letter. Coincident with this correspondence, we visited with USWEST Communications, Inc. ("USWEST") concerning their desire to continue providing intraLATA service to our customers. They indicated a willingness to continue. By default, USWEST was the carrier "picked" to each customer record since that was their carrier immediately prior to conversion.

We informed the customers that they now had the ability to access new carriers for intraLATA toll service and allowed time for them to switch carriers at not cost. This "window" was available for three months.

If Commission Staff or the Commissioners desire any additional information to supplement this filing, please advise.

Sincerely Bn reasurer Fort Bandall Telephone Company



Helping People Communicate Since 1951

227 South Main Street, P.O. Box 800, Clara City, Minnesota 56222 Wagner, South Dakota 57380 April 22, 1999

choice

South Dakota Public Utilities Commission Mr. Bill Bullard Capitol Bldg., 1st Floor 500 E. Capitol Avenue Pierre, SD 57501-5070

RECEIVED

Dokota Dia

Phone 605-422-1200 Fox 605-422-1201

APR 7 5 1999

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

FAX Received APR 22

Re: Implementation of IntraLATA Dialing Parity

Dear Mr. Bullard:

CommChoice, LLC is a start-up competitive local exchange carrier operating in South Dakota and Iowa. This letter is written regarding the recent FCC Order 99-54 establishing new deadlines for implementation of IntraLATA Dialing Parity.

CommChoice, LLC, has only been in active business for a few months. We have on file with the South Dakota PUC our Intrastate Access Tariff dated August 15, 1997. This tariff includes a section referred to as 3.2 Miscellaneous Access Services. At the heading 3.2.1 is the description of Presubscription. CommChoice, LLC, from the start of business, offered to our customers IntraLATA dialing parity or IntraLATA equal access. CommChoice works with all users of access and maintains an impartial position with regard to the customer's selection of an IntraLATA long distance carrier.

For compliance purposes regarding IntraLATA Dialing Parity, we respectfully submit this letter and our language noted in the Intrastate Access Tariff of August 15, 1997. Should the Commission request any additional information to supplement this filing, please contact Randy Roos or me at 605 232-3062.

Thank you for your assistance with regard to this issue.

Sincerely,

u Thouston

LAVR. Thornton CLEC Services

Stateline	
Telecomonications, I	
Connect	ing the Lemmon, Newell and Nisland Exchanges to the World

FAX Received APR 22 FE

RECEIVED

April 21, 1999

APR 2 3 1999

Bill Bullard, Executive Director South Dakota Public Utilities Commission State Capitol Building 500 East Capitol Avenue Pierre, South Dakota 57501

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

RE: Docket TC99-030 (Implementation Plan for IntraLATA Dialing Parity)

Dear Bill:

Enclosed for filing in the above referenced Docket is the "Implementation Plan for IntraLATA Toll Dialing Parity" of Stateline Telecommunications, Inc.

Please note that we have indicated a date for sending carrier notification letters that is in advance of the requested plan approval date. We've done this because of certain language in the FCC's March 23rd IntraLATA Dialing Parity Order, FCC 99-54, which indicates that LECs must implement intraLATA dialing parity within 30 days after approval of their implementation plan. This would seem to mean that the actual conversion to dialing parity should be accomplished within 30 days after this Commission approves the plan. Given this very short timeline, if LECs are not able to start the carrier notification process in advance of final Commission action on the plan, almost no time would be left for notifying and receiving responses from customers.

We are therefore, along with requesting approval of this filed plan, asking that the Commission grant us approval in advance of its final action on the plan to send out carrier notification letters. A sample copy of the carrier notification letter proposed for use is attached to the implementation plan as Appendix A. A sample copy of the proposed carrier participation form to be used is included with the plan as Appendix B.

If Commission Staff or the Commissioners desire any additional information to supplement this filing, please advise.

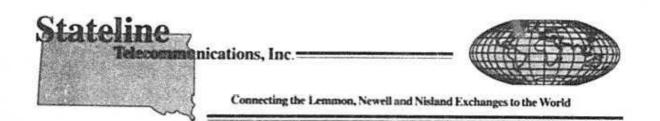
Thank you for your assistance in filing and distributing these documents.

Sincerely,

Darrell D. Henderson, General Manager

DDH:mb

P. O. Box 39, Bison, SD 57620, Phone: 605-244-5236, Fax: 605-244-7288



IMPLEMENTATION PLAN FOR INTRALATA TOLL DIALING PARITY

Stateline Telecommunications, Inc. submits this Implementation Plan for IntraLATA Toll Dialing Parity (hereinafter referenced as "the Plan") pursuant to 47 C.F.R. § 51.213 and recent Orders of the South Dakota Public Utilities Commission (hereinafter referenced as the "Commission") which require this filing on or before April 22, 1999. The purpose of the Plan is to provide information to the Commission concerning how and when Stateline Telecommunications, Inc. will convert to intraLATA toll dialing parity, or, as it is sometimes called, intraLATA equal access. The provisioning of such capability will permit customers to select which long distance carrier they want to handle their intraLATA 1+ calls.

1. Company name and address:

Stateline Telecommunications, Inc. P.O. Box 39 Bison, SD 57620

Telephone (605) 244-5236 Fax (605) 244-7288

2. Associated LATA:

Stateline Telecommunications, Inc. is located in and for purposes of this Plan associates with LATA 640.

3. Description of offering.

Stateline Telecommunications, Inc. will offer intraLATA toll dialing parity through the "full 2-PIC" presubscription software installed on a centralized basis at the access tandem switch of South Dakota Network, Inc. ("SDN"). The "full 2-PIC" method of presubscription allows a customer to presubscribe to one long distance carrier for all 1+ intraLATA toll calls and to presubscribe to the same or another long distance carrier for all 1+ intraLATA toll calls. Because the intraLATA toll dialing parity capability will be provisioned via SDN at 2900 West 10th, Sioux Falls, SD 57104, interconnection and access necessary for participation in the offering may be ordered by long distance carriers via SDN.

л

4. Included local exchange areas and conversion date.

IntraLATA toll dialing parity through SDN will be made available in the following local exhange areas beginning July 22, 1999:

Nisland 605-257 Newell 605-456 Lemmon 605-374 Lemmon 701-376

5. Interexchange carrier "carrier" notification.

All carriers certified in South Dakota to provide long distance services will be notified by June 1, 1999, of the conversion to intraLATA toll dialing parity (a sample copy of the carrier notification letter to be used is attached hereto as Appendix A). These carriers will be asked to respond by June 16, 1999, if they want to participate in the intraLATA toll presubscription process (a sample copy of the form which carriers will complete to indicate their participation in the presubscription process is attached hereto as Appendix B). For those carriers that choose to participate in the presubscription process, information regarding customer choices will be forwarded by the local exchange carrier to the participating carriers through the "Customer Account Record Exchange" ("CARE") process in place today for exchanging information regarding interLATA toll selections. The CARE process allows for regular reporting via magnetic tape or facsimile transmission of customer carrier selections between local exchange carriers and long distance carriers.

Stateline Telecommunications, Inc. will also provide a summary report that will list all carrier selections received for the long distance carrier for whom the report is prepared. This report will be mailed to each participating long distance carrier in advance of the intraLATA dialing parity implementation date.

Stateline Telecommunications, Inc. will make available preconversion customer name and address lists. These customer lists are available to assist participating carriers in their presubscription solicitation efforts. These lists may be provided subject to a reasonable non-discriminatory fee, with delivery contingent upon the carrier meeting all requirements for participation in the intraLATA presubscription process.

6. Customer notification.

A. Current customers.

Customers will be notified of the conversion to intraLATA toll dialing parity by letter postmarked by no later than June 25, 1999. In such letter, customers will be advised of their intraLATA choices. Customers will be given the option to remain with their existing intraLATA 1+ carrier, Express Communications, or to choose a different intraLATA carrier for their 1+ service. The letter will include a list indicating all carriers in addition to the existing 1+ carrier that have chosen to participate in the intraLATA toll presubscription process (a sample copy of the customer notification letter that will be used is attached hereto as Appendix C). Stateline Telecommunications, Inc. will include with the customer notification letter a customer response form (a sample copy of the customer response form to be used is attached hereto as Appendix D). Customers will be advised that if they choose a carrier other than their existing intraLATA 1+ carrier, they must fill out and return the response form postmarked by July 12, 1999. Those customers choosing to stay with their existing intraLATA 1+ carrier, will not have to return the response form. Their intraLATA 1+ service will remain with their current provider. Based on the customer response forms received and any letters of agency received directly from participating carriers, Stateline Telecommunications, Inc., as of the date and time that intraLATA dialing parity is implemented, will execute all neccessary carrier selection changes.

Customers will not be charged for making any change to their intraLATA 1+ carrier during the presubscription process. In addition, customers will be advised that they will be given 60 days after the intraLATA toll dialing parity implementation date to change their intraLATA 1+ carrier at no charge.

B. New customers.

New customers to Stateline Telecommunications, Inc.'s local exchange service, commencing such service after July 22, 1999, will be asked to choose both an intraLATA and interLATA carrier. They will be informed that regulations require that they choose a <u>carrier</u> for their intraLATA 1+ service (for calls within this LATA) and also choose a carrier for their interLATA 1+ service (for calls going outside this LATA). Stateline Telecommunications, Inc. will <u>either</u> inform <u>or provide</u> new customers <u>a list</u> of all carriers participating in intraLATA 1+ services and all carriers participating in interLATA 1+ services. Customer service representatives of Stateline Telecommunications, Inc. will reference the names of <u>all</u> carriers in the customer's exchange area providing 1+ toll service. If the customer requests, the customer service representative will provide contact telephone numbers for the available carriers. Lists used by the customer service representatives will contain carriers' names in random order.

Customers applying for service will be encouraged to make a carrier selection. New customers will make an affirmative selection before they will be assigned to any carrier for either their intraLATA 1+ or interLATA 1+ service. New customers will be advised that neither intraLATA 1+ dialed calls or interLATA 1+ dialed calls originated from the customer's local line will be possible until a carrier selection is made. Until a selection is made, nonselecting customers will need to dial a carrier access code to make either intraLATA or interLATA toll calls. 7. Req. est for approval of Plan.

Stateline Telecommunications, Inc. asks that the Commission grant its official approval of this Plan no earlier than June 22, 1999.

Dated this _21st_ day of April, 1999.

Respectfully submitted,

reade

Darrell D. Henderson, General Manager

Stateline Telecommunications, Inc. IntraLATA Dialing Parity Timeline

Carrier notifications completed by: June 1, 1999

Carrier responses due by: June 16, 1999

Customer notification completed by: June 25, 1999

Due date for customer response forms: July 12, 1999

IntraLATA dialing parity implementation date: July 22, 1999

End of 60 day grace period: September 20, 1999



nications, Inc.=



Connecting the Lemmon, Newell and Nisland Exchanges to the World

April 21, 1999

APPENDIX A

TO: All Long Distance Carriers of Record in the State of South Dakota

Stateline Telecommunications, Inc. (ST) is pleased to announce the provisioning of IntraLATA equal access in certain local exchange areas. A list of these exchanges is attached. This service will be made available to customers on July 22, 1999.

It is ST's intent to work closely with all users of access and maintain an impartial position with regard to the end user's selection of an IntraLATA long distance carrier. ST will supply a PIC list for the end user's selection of an IntraLATA long distance carrier. However, because IntraLATA equal access will be provisioned via South Dakota Network (SDN) at 2900 West 10th Street, Sioux Falls, SD 57104, interconnection and access may be ordered via SDN.

Please complete and return the attached form if you wish to be a carrier of choice on the IntraLATA equal access PIC list for the exchanges listed on the next page.

Questions may be directed to Jerry Reisenauer at 605-244-5236.

You must return your request for participation postmarked no later than June 16, 1999, to:

Contact Name: Jerry Reisenauer Stateline Telecommunications, Inc. P.O. Box 39 Bison, SD 57620 Fax: 605-244-7288

Sincerely,

Darrell D. Henderson, General Manager

DH:mb

cc: Bill Bullard, South Dakota Public Utilities Commission

TOWN	NPA	NXX
Nisland	605	257
Newell	605	456
.emmon	605	374
emmon	701	376

Stateline Telecommunications, inc. Exchanges to provide IntraLATA equal access:

APPENDIX B

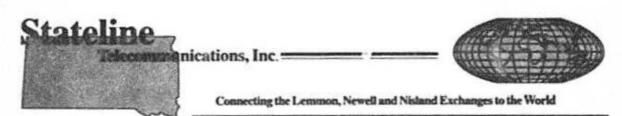
INTRALATA PIC LIST PARTICIPATION FORM FOR STATELINE TELECOMMUNICATIONS, INC.

	energia de la compania de la compani
YES	
NO	

Please respond by June 16, 1999.

Stateline Telecommunications, Inc. P.O. Box 39 Bison, SD 57620

8



April 21, 1999

APPENDIX C

To: All Customers of Stateline Telecommunications, Inc.

Stateline Telecommunications, Inc. is pleased to announce that effective July 22, 1999, we will make it possible for you to choose from various long distance companies for your in-state 1+ long distance service (intraLATA long distance service). This service includes all of your intrastate long distance calls made by dialing 1 plus the area code and local telephone number. With these changes, you will have the ability to select a long distance company for your in-state 1+ long distance service.

In conjunction with making these changes, Stateline Telecommunications, Inc. is asking all of its local exchange subscribers to choose whether they wish to retain the current long distance company providing their in-state 1+ long distance service or select another company for the service.

Currently, Express Communications provides your in-state 1+ long distance service. This company will continue to provide service to you unless you tell us to make a change and select another carrier. If you do nothing, your in-state 1+ long distance service will remain with Express Communications.

Attached is a list of long distance companies, in addition to Express Communications, that have agreed to provide 1+ in-state long distance services in your area. If you would like one of these other companies to provide your service, please complete the customer response form that is also attached and return it to our business office postmarked by no later than July 12, 1999.

You will not be charged for making a change to your existing in-state 1+ long distance service in response to this notice. In addition, for a period of 60 days after July 22, 1999, you may decide to change your in-state 1+ long distance carrier, one time, at no charge. After September 20, 1999, you will incur a Primary Interexchange Carrier (PIC) charge of \$5.00 for changing carriers.

Please call our office at 605-244-5236 if you have any questions on this matter.

Sincerely,

Darrell D. Henderson, General Manager

LIST

Listed below are the other Long Distance companies that are willing to offer you IntraLATA 1+ (gent: Ily in-state) long distance services. If you wish to change your intraLATA 1+ long distance carrier, please complete the attached form and return it <u>postmarked</u> by July 12, 1999, to Stateline Telecommunications, Inc., PO Box 39, Bison, SD 57620.

ABC Telephone Company, Inc. Bus/Res: 1-800-555-1234

LMNOP Telecommunications Bus: 1-800-555-2345

ZXC Telephone Company Bus/Res: 1-800-555-3456

Please respond on or before July 12, 1999.

In-State 1+ Long Distance Service (IntraLATA Long Distance Service) Customer Response Form (Please print)

Subscriber Billing Name:

Billing Address:_

(City, State, Zip)

Please change my long distance company for in-state (IntraLATA) 1+ long distance calls:

Telephone Number(s)

Carrier Name

	to		
	to		
	to		
	to		
	Lo		
	to		
	to		
	to	A highline (a standard and a standard	
	to		
second diversity of the second s		a second design of the second s	

I authorize Stateline Telecommunications, Inc. to make the above carrier change(s). I understand that only one carrier may be designated as my intraLATA or in-state preferred interexchange carrier (PIC) for any one telephone number.

X Subscriber's Signature (Required)

X Date (Required)

NOTE: You do not need to return this form if you wish to retain your current intraLATA or 1+ in-state long distance carrier, Express Communications.



RECEIVED

VIA EMAIL AND OVERNIGHT MAIL

APR 2 2 1999

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

April 21, 1999

William Bullard, Jr. Executive Director South Dakota Public Utilities Commission Capitol Building, 1st Floor 500 East Capitol Avenue Pierre, SD 57501-5070

HEADQUARTERS PO.Box 66 29705 453" Anna

Dear Mr. Buitard,

RE:

605.263.3301 800.239.7501 Fax 605.263.3995

\$7037-0064

www.dig.com

Attached is the original and ten copies of DTG's Dialing Parity Plan. An electronic copy has also been provided as requested. DTG would ask that this plan be approved no sooner than June 22, 1999, to maintain the timelines detailed in the plan.

Int. astate, IntraLATA Dialing Parity Plan - Docket No. TC99-030

If you have any questions, please contact the undersigned.

Sincerely,

General Counsel

RECEIVED

APR 2 2 1999

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF SOUTH DAKOTA

SOUTH DAKOTA PUBLIC

IN THE MATTER OF THE FCC ORDER ESTABLISHING NEW DEADLINES FOR IMPLEMENTATION OF INTRALATA DIALING PARITY BY LOCAL EXCHANGE CARRIERS.

TC99-030

IntraLATA Dialing Parity Plan Dakota Telecommunications Group, Inc. (DTG) DTG Community Telephone, Inc. (DCT) Dakota Telecom, Inc. (DTI)

Pursuant to federal directive (FCC 99-54, in CC Docket No. 96-98 (released March 23, 1999)) and the Commission guidance in this docket, DTG, in conjunction with it local exchange service subsidiaries, DCT and DTI (collectively referred to as "DTG"), submits the following plan to implement intraLATA dialing parity on July 22, 1999:

 No later than May 28, 1999, DTG will send the notice attached as Exhibit A to all interexchange carriers (IXC) registered with the Commission informing them that DTG is capable of providing an intraLATA presubscribed, primary interexchange carrier (PIC) selection to its local exchange service customers.

2. The IXCs will have until June 15, 1999, to file an access service request (ASR) for intrastate Feature Group D (FGD) to be included in the presubscription customer notification process. If the IXC is already purchasing interstate FGD, and no intrastate FGD ASR is received by June 15, 1999, DTG will assume that the IXC wishes to purchase intrastate FGD and the IXC will be included as one of the PIC carriers in the customer notification letter. If an IXC submits an ASR for FGD after the 15th, the IXC will not be included in the notification, but will be one of the PICs available to a customer from DTG's customer service representatives upon request.

3. On or before June 23, 1999, a letter will be sent to all DTG local exchange service customers notifying them of the initiation of presubscribed intraLATA dialing parity. A copy of that form letter is at Exhibit B. Enclosed with that letter will be a Letter of Agency (LOA) which the customer will use to designate the intraLATA PIC. A copy of the LOA is attached as Exhibit C. Because of the implications of Senate Bill 238, which will be effective on July 1, 1999, DTG believes an LOA is necessary to protect both DTG and the customer.

4. Customers who have indicated their PIC by returning a properly completed LOA will be assigned to the selected IXC beginning July 22, 1999. Customers who have not returned the LOA, or who have not properly completed the LOA by July 22, 1999, will be assigned the PIC code of their existing intrastate carrier until the LOA is completed

and provided to DTG's customer service office. This procedure will ensure uninterrupted intrastate long distance access by dialing "1" (605) plus the remaining seven digits.

5. IntraLATA dialing parity will be provided for the South Dakota LATA.

6. Any request for a change of a PIC will be accomplished with the provision of a properly completed LOA, or confirmation of the PIC change, as required by federal regulation and the recently enacted Senate Bill 238. Because of the change in federal regulation and state law, DTG is revising its customer service procedures to reflect those changes. When the revised procedures are available, they will be provided as Exhibit D to this plan.

Respectfully submitted this 22nd day of April, 1999.

Perkenpos

William P. Heaston Barbara E. Berkenpas Dakota Telecommunications Group, Inc. P.O. Box 66 Irene, SD 57037-0066

EXAMPLE

Exhibit A

Date

TO: All Interexchange Companies Certificated by the South Dakota Public Utilities Commission

Dakota Telecommunications Group, Inc. (DTG), on behalf of its local exchange service subsidiaries DTG Community Telephone, Inc. (DCT) and Dakota Telecom, Inc. (DTI), will provide IntraLATA equal access/dialing parity for customers in the following exchanges where it currently provides local exchange service:

Alsen	Monroe
Beresford Rural	Parker
Chancellor	Volin
Davis	Wakonda
Flyger	Worthing
Gayville	Centerville
Hurley	Canton
Irene	Harrisburg
Lennox	Tea
	Viborg

Dialing parity will be available on July 22, 1999. An IXC can become a presubscribed carrier by submitting to DTG an intrastate, intraLATA Feature Group D (FGD) access service request (ASR) for service through DTG's Viborg tandem (CLLI code -- VBRGSDAA00T) no later than June 15, 1999. DTG will then provide to its local exchange customers, in its customer notification, a list of those carriers that have ordered intrastate FGD indicating that those carriers are available for selection as the customer's presubscribed intrastate, intraLATA carrier. The ASR should be submitted to Beth Davis, P.O. Box 66, Irene, SD 57037, Tel. No. (605) 263-7251, Fax No. (605) 263-7195.

If you already purchase interstate FGD from DTG, and you do not provide an ASR for intrastate FGD by June 15, 1999, DTG will assume that you wish to purchase intrastate FGD. You will be included in the customer notification process and will be billed for intrastate FGD access as described above beginning July 22, 1999.

If you have any questions, please call.

Succerely,

Beth Davis

EXAMPLE

Exhibit B

Date

TO: All Local Exchange Customers

Effective July 22, 1999, DTG will be able to provide presubscribed intrastate, intraLATA dialing parity to you as a local exchange customer. In plain language, the term "presubscribed" means that your in-state long distance calls will always be carried by your chosen carrier when you dial the number "1" (605) plus the seven digit number. Your presubscribed in-state carrier is commonly known as your primary carrier or your PIC. This letter does not require you to change your existing in-state long distance provider if you do not want to make a change. If you currently have a block on your instate long distance service, you do not need to respond to this letter.

Because of concerns with customers being switched to long distance providers without their consent, a practice called "slamming," federal and state law now require that you make an affirmative choice of your in-state carrier. The best way to do this is to indicate your choice on the attached Letter of Agency (LOA), sign the LOA, and return it to DTG in the envelope provided. YOU MUST MAKE THIS CHOICE AND RETURN THE LOA BEFORE JULY 15, 1999. If you have more than one local exchange number, you will have to designate your PIC for each number. Again, you do not have to change your existing in-state long distance provider, just affirm that provider as your choice.

The LOA lists the companies that are available for selection as your PIC for instate service. If you do not wish to change your existing in-state long distance provider, check the space next to the letter A on the attached LOA. If you do change your carrier, you will need to check the space next to the letter B, and circle the carrier of your choice. There is no charge for changing your carrier at this time. There also will be no charge for a one-time change made during the 60-day period after July 22, 1999. Changes made after the 60-day period will be subject to a charge.

If you have any questions, please call our customer service department at 263-3301 or (800) 239-7501.

Sincerely,

Vhonda Miller

EXAMPLE

Exhibit C

Letter of Agency

Primary In-State Long Distance Service Carrier

I understand that I may designate one company as my primary intrastate long distance carrier when dialing an in-state long distance call from my local telephone number.

Place a mark next to either A. or B. and complete as indicated:

A. ____ I do not wish to change the current provider of my in-state long distance service, which is _____.

B. _____ I do want to change my in-state long distance carrier. I designate the carrier circled on the following list as my primary intrastate long distance carrier for the telephone number(s) listed below.

Circle only one:

C. I authorize DTG to put into effect my choice as indicated above. This Letter of Agency shall be in effect upon its receipt and accepts ice by DTG at its office in Irene, South Dakota. I certify that I am at least 18 years of tige and that I have proper authority to sign this Letter of Agency.

Signature Name (Please Print) Date Mailing Address

Telephone Number



West River Telecommunications Cooperative

and subsidiary companies West River Communications, Inc. Mobridge Telecommunications Co.

Mr. Bill Bullard, Executive Director South Dakota Public Utilities Commission State Capitol Building 500 East Capitol Avenue Pierre, South Dakota 57501

RECEIVED

APR 22 1999

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

RE: Docket TC99-030 (Implementation Plan for intraLATA Dialing Parity)

Good Morning, Bill,

Enclosed for filing in the above referenced Docket is an original and 10 copies of the "Implementation Plan for IntraLATA Toll Dialing Parity" of West River Telecommunications Cooperative

Please note that we have indicated a date for sending carrier notification letters that is in advance of the requested plan approval date. We've done this because of certain language in the FCC's March 23rd IntraLATA Dialing Parity Order, FCC 99-54, which indicates that LECs must implement intraLATA dialing parity within 30 days after approval of their implementation plan. This would seem to mean that the actual conversion to dialing parity should be accomplished within 30 days after this Commission approves the plan. Given this very short timeline, if LECs are not able to start the carrier notification process in advance of final Commission action on the plan, almost no time would be left for notifying and receiving responses from customers.

We are, therefore, along with requested approval of this filed plan, asking that the Commission grant us approval in advance of its final action on the plan to send out carrier notification letters. A sample copy of the carrier notification letter proposed for use is attached to the implementation plan as Appendix A. A sample copy of the proposed carrier participation form to be used is included with the plan as Appendix B.

If Commission Staff or the Commissioners desire any additional information to supplement this filing, please advise.

Thank you for your assistance in filing and distributing these documents.

Sincerely, a Barfield

Robert A. Barfield General Manager

West River Communications, Inc. 1-800-256-1736 West River Telecommunications 701-748-2211 1-800-748-7220 Mobridge Telecommunications Co. 1-800-256-1734

PO Box 467 - Hazen - North Dakota - 58545

IMPLEMENTATION PLAN FOR INTRALATA TOLL DIALING PARITY

West River Telecommunications Cooperative submits this Implementation Plan for IntraLATA Toll Dialing Parity (hereinafter referenced as "the Plan") pursuant to 47 C.F.R. § 51.213 and recent Orders of the South Dakota Public Utilities Commission (hereinafter referenced as the "Commission") which require this filing or or before April 22, 1999. The purpose of the Plan is to provide information to the Commission concerning how and when West River Telecommunications Cooperative will convert to intraLATA toll dialing parity, or, as it is sometimes called, intraLATA equal access. The provisioning of such capability will permit customers to select which long distance carrier they want to handle their intraLATA 1+ calls.

Company name and address:

West River Telecommunications Cooperative PO Box 467 Hazen, North Dakota 58545 701-748-2211 FAX 701-748-6800

Associated LATA:

West River Telecommunications Cooperative is located in and for purposes of this Plan associates with LATA 640.

Description of offering.

West River Telecommunications Cooperative will offer intraLATA toll dialing parity through the deployment of "full 2-PIC" presubscription software at each end office location. The "full 2-PIC" method of presubscription allows a customer to presubscribe to one long distance carrier for all 1+ intraLATA toll calls and to presubscribe to the same or another long distance carrier for all 1+ interLATA toll calls. Interconnection and/or access necessary for participation in the offering may be ordered by long distance carriers directly from West River Telecommunications Cooperative.

4. Included local exchange areas and conversion late.

IntraLATA toll dialing parity through these software upgrades will be made available in the following local exchange areas beginning July 22, 1999:

605/823 McLaughlin 701/827 North McLaughlin

Interexchange carrier "carrier" notification

All carriers certified in South Dakota to provide long distance services will be notified by June 1, 1999, of the conversion to intraLATA toll dialing parity (a sample copy of the carrier notification letter to be used is attached hereto as Appendix A). These carriers will be asked to respond by June 16, 1999, if they want to participate in the intraLATA toll presubscription process (a sample copy of the form which carriers will complete to indicate their participation in the presubscription process is attacl d hereto as Appendix B). For those carriers that choose to participate in the presubscription process, information regarding customer choices will be forwarded by the local exchange carrier to the participating carriers through the "Customer Account Record Exchange" ("CARE") process in place today for exchanging information regarding interLATA toll selections. The CARE process allows for a regular reporting via magnetic tape or facsimile transmission of customer carrier selections between local exchange carriers and long distance carriers.

West River Telecommunications Cooperative will also provide a summary report that will list all carrier selections received for the long distance carrier for whom the report is prepared. This report will be mailed to each participating long distance carrier in advance of the intraLATA dialing parity implementation date.

West River Telecommunications Cooperative will make available customer name and address lists. These customer lists are available to assist participating carriers in their presubscription solicitation efforts. These lists may be provided subject to a reasonable, non-discriminatory fee, with delivery contingent upon the carrier meeting all requirements for participation in the intraLATA presubscription process.

<u>Customer notification.</u>

A. <u>Current customers.</u>

Customers will be notified of the conversion to intraLATA toll dialing parity by letter postmarked by no later than June 25, 1999. In such letter, customers will be advised of their intraLATA choices. Customers will be given the option to remain with their existing intraLATA 1+ carrier, West River Long Distance, or to choose a different intraLATA carrier for their 1+ service. The letter will include a list indicating all carriers in addition to the existing 1+ carrier that have chosen to participate in the intraLATA toll presubscription process (a sample copy of the customer notification letter that will be used is attached hereto as Appendix C).

West River Telecommunications Cooperative will include with the customer notification letter a customer response form (a sample copy of the customer response form to be used is attached hereto as Appendix D). Customers will be advised that if they choose a carrier other than their existing intraLATA 1+ carrier, they must fill out and return the response form postmarked by July 12, 1999. Those customers choosing to stay with their existing intraLATA 1+ carrier, will not have to return the response form. Their intraLATA 1+ service will remain with their current provider. Based on the customer response forms received and any letters of agency received directly from participating carriers, West River Telecommunications Cooperative, as of the date and time that intraLATA dialing parity is implemented, will execute all necessary carrier selection changes.

Customers will not be charged for making any change to their intraLATA 1+ carrier during the presubscription process. In addition, customers will be advised that they will be given 60 days after the intraLATA toll dialing parity implementation date to change their intraLATA 1+ carrier at no charge.

B. New Customers

New customers to West River Telecommunications Cooperative's, local exchange service, commencing such service after July 22, 1999, will be asked to choose both an intraLATA and interLATA carrier. They will be informed that regulations require that they choose a carrier for their intraLATA 1+ service (for calls within this LATA) and also choose a carrier for their interLATA 1+ service (for calls going outside this LATA). West River Telecommunications Cooperative will either inform or provide new customers a list of all carriers participating in intraLATA 1+ services and all carriers participating in interLATA 1+ services. Customer service representatives of West River Telecommunications Cooperative will reference the names of all carriers in the customer's exchange area providing 1+ toll service. If the customer requests, the customer service representative will provide contact telephone numbers for the available carriers. Lists used by the customer service representative will contain carriers' names in random order.

Customers applying for service will be encouraged to make a carrier selection. New customers will make an affirmative selection before they will be assigned to any carrier for either their intraLATA 1+ or interLATA 1+ service. New customers will be advised that neither intraLATA 1+ dialed calls or interLATA 1+ dialed calls originated from the customer's local line will be possible until a carrier selection is made. Until a selection is made, non-selecting customers will need to dial a carrier access code to make either intraLATA or interLATA toll calls.

New customers ordering service between, the date notification is sent to existing customers, June 25, 1999, and the date of conversion, July 22, 1999, will be asked to make a arrier selection for both their InterLATA and IntraLATA carrier. Howe /er, until the date of conversion to IntraLATA dialing parity, they will be assigned to the existing 1+ provider for their 1+ IntraLATA toll traffic.

6. Request for approval of Plan

West River Telecommunications Cooperative asks that the Commission grant its official approval of this Plan no earlier than June 22, 1999.

Dated this 20th day of April 1999.

Sincerely, Ref Q. Ba

Robert A. Barfield General Manager

West River Telecommunications Cooperative IntraLATA Dialing Parity Timeline

Carrier notifications completed by: June 1, 1999

Carrier responses due by: June 16, 1999

Customer notification completed by: June 25, 1999

Due date for customer response forms: July 12, 1999

IntraLATA dialing parity implementation date: July 22, 1999

End of 60 day grace period: September 20, 1999



West River Telecommunications Cooperative

and subsidiary companies West River Communications, Inc. Mobridge Telecommunications Co.

Date

TO: All Long Distance Carriers of Record in the State of South Dakota

West River Telecommunications Cooperative (WRTC) is pleased to announce the provisioning of intraLATA equal access in certain local exchange areas. A list of these exchanges is attached. This service will be made available to customers on July 22, 1999.

It is WRTC's intent to work closely with all users of access and maintain an impartial position with regard to the end user's selection of an IntraLATA long distance carrier. WRTC will supply a PIC list for the end user's selection of an IntraLATA long distance carrier. IntraLATA equal access will be provisioned on an end office basis and therefore interconnection and access may be ordered through West River Telecommunications Cooperative.

Please complete and return the attached form if you wish to be a carrier of choice on the IntraLATA equal access PIC list for the exchanges listed on the next page.

Questions may be directed to Blaine L. Lemer, Plant Manager at 701-748-2211.

You must return your request for participation postmarked no later than June 16, 1999, to:

Contact Name: LEC Name: Address:

FAX #

Blaine L. Lemer West River Telecommunications Cooperative PO Box 467 Hazen, ND 58545 701-748-6800

Sincerely,

Blaine L. Lemer Plant Manager

BLL/co

cc: Bill Bullard, South Dakota Public Utilities Commission

West River Communications, Inc. 1-800-256-1736 West River Telecommunications 701-748-2211 1-800-748-7220 Mobridge Telecommunications Co. 1-800-256-1734

PO Box 467 - Hazen - North Dakota - 58545

West River Telecommunications Cooperative exchanges to provide IntraLATA equal access:

TOWN	NPA	NXX
McLaughlin	605	823
McLaughlin	701	827

APPENDIX B

INTRALATA PIC LIST PARTICIPATION FORM FOR WEST RIVER TELECOMMUNICATIONS COOPERATIVE

CARRIER NAME	
ACNA	
CIC	
BILLING ADDRESS	
BILLING CONTACT	
PHONE NUMBER	
FAX NUMBER	
E-MAIL ADDRESS	
CUSTOMER SERVICE NUMBER (BUSINESS)	
CUSTOMER SERVICE NUMBER (RESIDENCE)	
WOULD YOU LIKE TO BE INCLUDED ON THE INTRALATA PIC LIST?	YES NO
SIGNATURE	
TITLE	
DATE	

Please respond by June 16, 1999.

Address: PO Box 467 Contact Name: Blaine L. Lemer, Plant Manager West River Telecommunications Cooperative Address: Hazen, ND 58545



West River Telecommunications Cooperative

and subsidiary companies West River Communications, Inc. Mobridge Telecommunications Communications

Date

To: All Customers of West River Telecommunications Cooperative

West River Telecommunications Cooperative is pleased to announce that effective July 22, 1999, we will make it possible for you to choose from various long distance companies for your in-state 1+ long distance service (intraLATA long distance service). This service includes all of your intrastate long distance calls made by dialing 1 plus the area code and local telephone number. With these changes, you will have the ability to select a long distance company for your in-state 1+ long distance service.

In conjunction with making these changes, West River Telecommunications Cooperative is asking all of its local exchange subscribers to choose whether they wish to retain the current long distance company providing their in-state 1+ long distance service or select another company for the service.

Currently West River Long Distance provides your in-state 1+ long distance service. This company will continue to provide service to you unless you tell us to make a change and select another carrier. If you do nothing, your in-state 1 long distance service will remain with West River Long Distance.

Attached is a list of long distance companies, in addition to West River Long Distance, that have agreed to provide 1+ in-state long distance services in your area. If you would like one of these other companies to provide your service, please complete the customer response form that is also attached and return it to our business office postmarked by no later than July 12, 1999.

You will not be charged for making a change to your existing in-state 1+ long distance service in response to this notice. In addition, for a period of 60 days after July 22, 1999, you may decide to change your in-state 1+ long distance carrier, one time, at no charge. After September 20, 1999, you will incur a Primary Interexchange Carrier (PIC) charge of \$5.00 for changing carriers.

Please call our office at 1-800-748-7220 if you have any questions on this matter.

Sincerely,

Robert A. Barfield General Manager

RAB/co

West River Communications, Inc. 1-800-256-1736 West River Telecommunications 701-748-2211 1-800-748-7220 Mobridge Telecommunications Co. 1-800-256-1734

PO Box 467 - Hazen - North Dakota - 58545

Listed below are the other Long Distance companies that are winling to offer you IntraLATA 1+ (generally in-state) long distance services. If you wish to change your intraLATA 1+ long distance carrier, please complete the attached form and return it postmarked by July 12, 1999 to West River Telecommunications Cooperative, 20 Box 467, Hazen, ND 58545.

ABC Telephone Company, Inc. Bus/Res: 1-800-555-1234

LMNOP Telecommunications Bus: 1-800-555-2345

ZXC Telephone Company Bus/Res: 1-800-555-3456

Please respond on or before July 12, 1999.

LIST

APPENDIX D

In-State 1+ Long Distance Service (IntraLATA Long Distance Service) Customer Response Form (Please print)

A COLORED OF

Subscriber Billing Name:

Billing Address:

(City, State, Zip)

Please change my long distance company for in-state (IntraLATA) 1+ long distance calls:

Telephone Number(s)

Carrier Name

Contraction of the second s	10
	to
Sector and the sector and the sector of the	10
Contraction of the Contraction o	to
	to
	A

I authorize West River Telecommunications Cooperative to make the above carrier change(s). I understand that only one carrier may be designated as my intraLATA or in-state preferred interexchange carrier (PIC) for any one telephone number.

X Subscriber's Signature (Required)

X Date (Required)

NOTE: You do not need to return this form if you wish to retain your current intraLATA or 1+ in-state long distance carrier, West River Long Distance.



April 20, 1999

Mr. Bill Bullard, Executive Director South Dakota Public Utilities Commission State Capitol Building 500 East Capitol Avenue Pierre, South Dakota 57501

West River Telecommunications Cooperative

and subsidiary companies West River Communications, Inc. Mobridge Telecommunications Co.

RECEIVED

APR 2 2 1999 SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

RE: Docket TC99-030 (Implementation Plan for IntraLATA Dialing Parity)

Good Morning, Bill,

Enclosed for filing in the above referenced Docket is an original and 10 copies of the "Implementation Plan for IntraLATA Toll Dialing Parity" of Mobridge Telecommunications Co.

Please note that we have indicated a date for sending can ier notification letters that is in advance of the requested plan approval date. We've done this because of certain language in the FCC's March 23rd IntraLATA Dialing Parity Order, FCC 99-54, which indicates that LECs must implement intraLATA dialing parity within 30 days after approval of their implementation plan. This would seem to mean that the actual conversion to dialing parity should be accomplished within 30 days after this Commission approves the plan. Given this very short timeline, if LECs are not able to start the carrier notification process in advance of final Commission action on the plan, almost no time would be left for notifying and receiving responses from customers.

We are, therefore, along with requested approval of this filed plan, asking that the Commission grant us approval in advance of its final action on the plan to send out carrier notification letters. A sample copy of the carrier notification letter proposed for use is attached to the implementation plan as Appendix A. A sample copy of the proposed carrier participation form to be used is included with the plan as Appendix B.

If Commission Staff or the Commissioners desire any additional information to supplement this filing, please advise.

Thank you for your assistance in filing and distributing these documents.

Sincerely, 1 Doufiel

Robert A. Barfield General Manager

West River Communications, Inc. 1-800-256-1736 West River Telecommunications 701-748-2211 1-800-748-7220 Mobridge Telecommunications Co. 1-800-256-1734

PO Box 467 - Hazen - North Dakota - 58545

IMPLEMENTATION PLAN FOR INTRALATA TOLL DIALING PARITY

Mobridge Telecommunications Co. submits this Implementation Plan for IntraLATA Tell Dialing Parity (hereinafter referenced as "the Plan") pursuant to 47 C.F.R. § 51.213 and recent Orders of the South Dakota Public Utilities Commission (hereinafter referenced as the "Commission") which require this filing or or before April 22, 1999. The purpose of the Plan is to provide information to the Commission concerning how and when Mobridge Telecommunications Co. will convert to intraLATA toll dialing parity, or, as it is sometimes called, intraLATA equal access. The provisioning of such capability will permit customers to select which long distance carrier they want to handle their intraLATA 1+ calls.

1. Company name and address:

Mobridge Telecommunications Co. PO Box 467 Hazen, North Dakota 58545 701-748-2211 FAX 701-748-6800

Associated LATA:

Mobridge Telecommunications Co. is located in and for purposes of this Plan associates with LATA 640.

Description of offering.

14obridge Telecommunications Co. will offer intraLATA toll dialing parity through the "full 2-PIC" presubscription software installed on a centralized basis at the access tandem switch of South Dakota Network, Inc. ("SDN"). The "full 2-PIC" method of presubscription allows a customer to presubscribe to one long distance carrier for all 1 + intraLATA toll calls and to presubscribe to the same or another long distance carrier for all 1 + interLATA toll calls. Because the intraLATA toll dialing parity capability will be provisioned via SDN at 2900 West 10th, Sioux Falls, SD 57104, interconnection and access necessary for participation in the offering may be ordered by long distance carriers via SDN.

Included local exchange areas and conversion date.

IntraLATA toll dialing parity through SDN will be made available in the following local exchange areas beginning July 22, 1999:

605/845 Mobridge

5. Interexchange carrier "carrier" potification

All carriers certified in South Dakota to provide long distance services will be notified by June 1, 1999, of the conversion to intraLATA toll dialing parity (a sample copy of the carrier notification letter to be used is attached hereto as Appendix A). These carriers will be asked to respond by June 16, 1999, if they want to participate in the intraLATA soll presubscription process (a sample copy of the form which carriers will complete to indicate their participation in the presubscription process is attached hereto as Appendix B). For those carriers that choose to participate in the presubscription process, information regarding customer choices will be forwarded by the local exchange carrier to the participating carriers through the "Customer Account Record Exchange" ("CARE") process in place today for exchanging information regarding interLATA toll selections. The CARE process allows for a regular reporting via magnetic tape or facsimile transmission of customer carrier selections between local exchange carriers.

Mobridge Telecommunications Co. will also provide a summary report that will list all carrier selections received for the long distance carrier for whom the report is prepared. This report will be mailed to each participating long distance carrier in advance of the intraLATA dialing parity implementation date.

Mobridge Telecommunications Co. will make available customer name and address lists. These customer lists are available to assist participating carriers in their presubscription solicitation efforts. These lists may be provided subject to a reasonable, non-discriminatory fee, with delivery contingent upon the carrier meeting all requirements for participation in the intraLATA presubscription process.

Customer notification.

A. <u>Current customers.</u>

Customers will be notified of the conversion to intraLATA toll dialing parity by letter postmarked by no later than June 25, 1999. In such letter, customers will be advised of their intraLATA choices. Customers will be given the option to remain with their existing intraLATA 1+ carrier, West River Long Distance, or to choose a different intraLATA carrier for their 1+ service. The letter will include a list indicating all carriers in addition to the existing 1+ carrier that have chosen to participate in the intraLATA toll presubscription process (a sample copy of the customer notification letter that will be used is attached hereto as Appendix C).

Mobridge Telecommunications Co. will include with the customer notification letter a customer response form (a sample copy of the customer response form to be used is attached hereto as Appendix D). Customers will be advised that if they choose a carrier other than their existing intraLATA 1+ carrier, they must fill out and return the response form postmarked by July 12, 1999. Those customers choosing to stay with their existing intraLATA 1+ carrier, will not have to return the response form. Their intraLATA 1+ service will remain with their current provider. Based on the customer response forms received and any letters of agency received directly from participating carriers, Mobridge Telecommunications Co., as of the date and time that intraLATA dialing parity is implemented, will execute all necessary carrier selection changes.

Customers will not be charged for making any change to their intraLATA 1+ carrier during the presubscription process. In addition, customers will be advised that they will be given 60 days after the intraLATA toll dialing parity implementation date to change their intraLATA 1+ carrier at no charge.

B. New Customers

New customers to Mobridge Telecommunications Co's., local exchange service, commencing such service after July 22, 1999, will be asked to choose both an intraLATA and interLATA carrier. They will be informed that regulations require that they choose a carrier for their intraLATA 1+ service (for calls within this LATA) and also choose a carrier for their interLATA 1+ service (for calls going outside this LATA). Mobridge Telecommunications Co. will either inform or provide new customers a list of all carriers participating in intraLATA 1+ services and all carriers participating in interLATA 1+ services. Customer service representatives of Mobridge Telecommunications Co. will reference the names of all carriers in the customer's exchange area providing 1+ toll service. If the customer requests, the customer service representative will provide contact telephone numbers for the available carriers. Lists used by the customer service representative will contain carriers' names in random order.

Customers applying for service will be encouraged to make a carrier selection. New customers will make an affirmative selection before they will be assigned to any carrier for either their intraLATA 1+ or interLATA 1+ service. New customers will be advised that neither intraLATA 1+ dialed calls or interLATA 1+ dialed calls originated from the customer's local line will be possible until a carrier selection is made. Until a selection is made, non-selecting customers will need to dial a carrier access code to make either intraLATA or interLATA toll calls.

New customers ordering service between, the date notification is sent to existing customers, June 25, 1999, and the date of conversion, July 22, 1999, will be asked to make a carrier selection for both their InterLATA and IntraLATA carrier. However, "ntil the date of conversion to IntraLATA dialing parity, they will be assigned to the existing 1+ provider for their 1+ IntraLATA toll traffic. Request for approval of Plan

Mobridge Telecommunications Co. asks that the Commission grant its official approval of this Plan no earlier than June 22, 1999.

Dated this 20th day of April 1999.

Sincerely A. Robert A. Barfield General Manager

б.

Mobridge Telecommunications Co. IntraLATA Dialing Parity Timeline

Carrier notifications completed by: June 1, 1999

Carrier responses due by: June 16, 1999

Customer notification completed by: June 25, 1999

Due date for customer response forms: July 12, 1999

IntraLATA dialing parity implementation date: July 22, 1999

End of 60 day grace period: September 20, 1999



West River Telecommunications Cooperative

and subsidiary companies West River Communications, Inc. Mobridge Telecommunications Co. APPENDIX A

Date

TO: All Long Distance Carriers of Record in the State of South Dakota

Mobridge Telecommunications Co. (MTC) is pleased to announce the provisioning of intraLATA equal access in certain local exchange areas. A list of these exchanges is attached. This service will be made available to customers on July 22, 1999.

It is MTC's intent to work closely with all users of access and maintain an impartial position with regard to the end user's selection of an IntraLATA long distance carrier. MTC will supply a PIC list for the end user's selection of an IntraLATA long distance carrier. However, because intraLATA equal access will be provisioned via South Dakota Network (SDN) at 2900 West 10th Street, Sioux Falls, SD 57104, interconnection and access may be ordered via SDN.

Please complete and return the attached form if you wish to be a carrier of choice on the intraLATA equal access PIC list for the exchanges listed on the next page.

Questions may be directed to Blaine L. Lemer, Plant Manager at 701-748-2211.

You must return your request for participation postmarked no later than June 16, 1999, to:

Contact Name: LEC Name: Address:

FAX #

Blaine L. Lemer Mobridge Telecommunications Co. PO Box 467 Hazen, ND 58545 701-748-6800

Sincerely,

Blaine L. Lemer Plant Manager

BLL/co

cc: Bill Bullard, South Dakota Public Utilities Commission

West River Communications, Inc. :-800-256-1736 West River Telecommunications 701-748-2211 1-800-748-7220 Mobridge Telecommunications Co. 1-800-256-1734

PO Box 467 - Hazen - North Dakota - 58545

Mobridge Telecommunications Co. exchanges to provide IntraLATA equal access:

NPA	NXX
605	845
	605

APPENDIX B

INTRALATA PIC LIST PARTICIPATION FORM FOR MOBRIDGE TELECOMMUNICATIONS CO.

CARRIER NAME	
ACNA	
CIC	
BILLING ADDRESS	
BILLING CONTACT	
PHONE NUMBER	
FAX NUMBER	
E-MAIL ADDRESS	
CUSTOMER SERVICE NUMBER (BUSINESS)	
CUSTOMER SERVICE NUMBER (RESIDENCE)	
WOULD YOU LIKE TO BE INCLUDED ON THE INTRALATA PIC LIST?	YES NO
SIGNATURE	
TITLE	
DATE	

Please respond by June 16, 1999.

Address: PO Box 467 Contact Name: Blaine L. Lemer, Plant Manager Mobridge Telecommunications Co. Address: Hazen, ND 58545



West River Telecommunications Cooperative

and subsidiary companies West River Communications, Inc. Mobridge Telecommunications Contents

Date

To: All Customers of Mobridge Telecommunications Co.

Mobridge Telecommunications Co. is pleased to announce that effective July 22, 1999, we will make it possible for you to choose from various long distance companies for your in-state 1+ long distance service (intraLATA long distance service). This service includes all of your intrastate long distance calls made by dialing 1 plus the area code and local telephone number. With these changes, you will have the ability to select a long distance company for your in-state 1+ long distance service.

In conjunction with making these changes, Mobridge Telecommunications Co. is asking all of its local exchange subscribers to choose whether they wish to retain the current long distance company providing their in-state 1+ long distance service or select another company for the service.

Currently West River Long Distance provides your in-state 1+ long distance service. This company will continue to provide service to you unless you tell us to make a change and select another carrier. If you do nothing, your in-state 1+ long distance service will remain with West River Long Distance.

Attached is a list of long distance companies, in addition to West River Long Distance, that have agreed to provide 1+ in-state long distance services in your area. If you would like one of these other companies to provide your service, blease complete the customer response form that is also attached and return it to our business office postmarked by no later than July 12, 1999.

You will not be charged for making a change to your existing in-state 1+ long distance service in response to this notice. In addition, for a period of 60 days after July 22, 1999, you may decide to change your ir-state 1+ long distance carrier, one time, at no charge. After September 20, 1999, you will incur a Primary Interexchange Carrier (PIC) charge of \$5.00 for changing carriers.

Please call our office at 1-800-748-7220 if you have any questions on this matter.

Sincerely,

Robert A. Barfield General Manager

RAB/co

West River Communications, Inc. 1-800-256-1736 West River Telecommunications 701-748-2211 1-800-748-7220 Mobridge Telecommunications Co. 1-800-256-1734

PO Box 467 - Hazen - North Dakota - 58545

LIST

Listed below are the other Long Distance companies that are willing to offer you IntraLATA 1+ (generally in-state) long distance services. If you wish to change your intraLATA 1+ long distance carrier, please complete the attached form and return it postmarked by July 12, 1999 to Mobridge Telecommunications Co., PO Box 467, Hazen, ND 58545.

ABC Telephone Company, Inc. Bus/Res: 1-800-555-1234

LMNOP Telecommunications Bus: 1-800-555-2345

ZXC Telephone Company Bus/Res: 1-800-555-3456

Please respond on or before July 12, 1999.

START

OF

RETAKE

Listed below are the other Long Distance companies that are willing to offer you IntraLATA 1+ (generally in-state) long distance services. If you wish to change your intraLATA 1+ long distance carrier, please complete the attached form and return it postmarked by July 12, 1999 to Mobridge Telecommunications Co., PO Box 467, Hazen, ND 58545.

ABC Telephone Company, Inc. Bus/Res: 1-800-555-1234

LMNOP Telecommunications Bus: 1-800-555-2345

ZXC Telephone Company Bus/Res: 1-800-555-3456

Please respond on or before July 12, 1999.

LIST

APPENDIX D

In-State 1+ Long Distance Service (IntraLATA Long Distance Service) Customer Response Form (Please print)

Subscriber Billing Name:

Billing Address:

(City, State, Zip)

Please change my long distance company for in-state (IntraLATA) 1+ long distance calls:

Telephone Number(s)

Carrier Name

	to
	to
the second secon	
An opposite the second s	to

I authorize Mobridge Telecommunications Co. to make the above carrier change(s). I understand that only one carrier may be designated as my intraLATA or in-state preferred interexchange carrier (PIC) for any one telephone number.

X Subscriber's Signature (Required)

X Date (Required)

NOTE: You do not need to return this form if you wish to retain your current intraLATA or 1+ in-state long distance carrier, West River Long Distance. END

OF

RETAKE



Heartland Communications, Inc.

120 E. FIRST • P.O. BOX 48 • KIMBALL, SD 57355-0048 • PHONE (605) 778-6221 • FAX (605) 778-8080

April 19, 1999

RECEIVED

Bill Bullard, Executive Director South Dakota Public Utilities Commission State Capitol Building 500 East Capitol Ave. Pierre, South Dakota 57501

APR 22 1999

SOUTH DAKOTA PUBLIC

RE: Docket TC99-030 (Implementation Plan for IntraLATA Dialing Parity)

Dear Bill:

Enclosed for filings are 10 revised copies in the above referenced Docket is the "Implementation Plan for IntraLATA Toll Dialing Parity" of Heartland Communications, Inc.

Please replace the previous copy sent earlier this week with these.

Thank you for your assistance in filing and distributing these documents.

Sincerely,

Mark D. Benton, Manager



Heartland Communications, Inc.

120 E. FIRST • P.O. BOX 48 • KIMBALL, SD 57355-0048 • PHONE (605) 778-6221 • FAX (605) 778-8080

April 19, 1999

RECEIVED

Bill Bullard, Executive Director South Dakota Public Utilities Commission State Capitol Building 500 East Capitol Ave. Pierre, South Dakota 57501

APR 22 1999

SOUTH DAKOTA PUBLIC

RE: Docket TC99-030 (Implementation Plan for IntraLATA Dialing Parity)

Dear Bill:

Enclosed for filing in the above referenced Docket is the "Implementation Plan for IntraLATA Toll Dialing Parity" of Heartland Communications, Inc.

Please note that we have indicated a date for sending carrier notification letters that is in advance of the requested plan approval date. We've done this because of certain language in the FCC's March 23rd IntraLATA Dialing Parity Order, FCC 99-54, which indicates that LECs must implement intraLATA dialing parity within 30 days after approval of their implementation plan. This would seem to mean that the actual conversion to dialing parity should be accomplished within 30 days after this Commission approves the plan. Given this very short timeline, if LECs are not able to start the carrier notification process in advance of final Commission action on the plan, almost no time would be left for notifying and receiving responses from customers.

We are therefore, along with requesting approval of this filed plan, asking that the Commission grant us approval in advance of its final action on the plan to send out carrier notification letters. A sample copy of the carrier notification letter proposed for use is attached to the implementation plan as Appendix A. A sample copy of the proposed carrier participation form to be used is included with the plan as Appendix B.

If Commission Staff or the Commissioners desire any additional information to supplement this filing, please advise.

Thank you for your assistance in filing and distributing these documents.

Sincerely,

Mark D. Benton, Manager

RECEIVED

APR 22 1999

IMPLEMENTATION PLAN FOR INTRALATA TOLL DIALING PARITY

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

Heartland Communications, Inc. submits this Implementation Plan for IntraLATA Toll Dialing Parity (hereinafter referenced as "the Plan") pursuant to 47 C.F.R. § 51.213 and recent Orders of the South Dakota Public Utilities Commission (hereinafter referenced as the "Commission") which require this filing on or before April 22, 1999. The purpose of the Plan is to provide information to the Commission concerning how and when Heartland Communications, Inc. will convert to intraLATA toll dialing parity, or, as it is sometimes called, intraLATA equal access. The provisioning of such capability will permit customers to select which long distance carrier they want to handle their intraLATA 1+ calls.

1. Company name and address:

Heartland Communications, Inc. PO Box 48 Kimball, SD 57355 Phone : 605.778.6221 Fax : 605.778.8080

2. Associated LATA:

Heartland Communications, Inc. is located in and for purposes of this Plan associates with LATA 640.

3. Description of offering.

Heartland Communications, Inc. will offer intraLATA toll dialing parity through the "full 2-PIC" presubscription software installed on a centralized basis at the access tandem switch of South Dakota Network, Inc. ("SDN"). The "full 2-PIC" method of presubscription allows a customer to presubscribe to one long distance carrier for all 1+ intraLATA toll calls and to presubscribe to the same or another long distance carrier for all 1+ interLATA toll calls. Because the intraLATA toll dialing parity capability will be provisioned via SDN at 2900 West 10th, Sioux Falls, SD 57104, interconnection and access necessary for participation in the offering may be ordered by long distance carriers via SDN.

4. Included local exchange areas and conversion date.

IntraLATA toll dialing parity through SDN ill be made available in the following local exchange areas beginning July 22, 1999:

PLATTE 605-337

5. Interexchange carrier "carrier" notification.

All carriers certified in South Dakota to provide long distance services will be notified by June 1, 1999, of the conversion to intraLATA toll dialing parity (a sample copy of the carrier notification letter to be used is attached hereto as Appendix A). These carriers will be asked to respond by June 16, 1999, if they want to participate in the intraLATA toll presubscription process (a sample copy of the form which carriers will complete to indicate their participation in the presubscription process is attached hereto as Appendix B). For those carriers that choose to participate in the presubscription process, information regarding customer choices will be forwarded by the local exchange carrier to the participating carriers through the "Customer Account Record Exchange" ("CARE") process in place today for exchanging information regarding interLATA toll selections. The CARE process allows for a regular reporting via magnetic tape or facsimile transmission of customer carrier selections between local exchange carriers and long distance carriers.

Heartland Communications, Inc. will also provide a summary report that will list all carrier selections received for the long distance carrier for whom the report is prepared. This report will be mailed to each participating long distance carrier in advance of the intraLATA dialing parity implementation date

Heartland Communications, Inc. will make available preconversion customer name and address lists. These customer lists are available to assist participating carriers in their presubscription solicitation efforts. These lists may be provided subject to a reasonable, non-discriminatory fee, with delivery contingent upon the carrier meeting all requirements for participation in the intraLATA presubscription process.

6. Customer notification.

A. Current customers.

Customers will be notified of the conversion to intraLATA toll dialing parity by letter postmarked by no later than June 25, 1999. In such letter, customers will be advised of their intraLATA choices. Customers will be given the option to remain with their existing intraLATA 1+ carrier, [provide name of current 1+ intraLATA carrier], or to choose a different intraLATA carrier for their 1+ service. The letter will include a list indicating all carriers in addition to the existing 1+ carrier that have chosen to participate in the intraLATA toll presubscription process (a sample copy of the customer notification letter that will be used is attached hereto as Appendix C).

Heartland Communications, Inc. will include with the customer notification letter a customer response form (a sample copy of the customer response form to be used is attached hereto as Appendix D). Customers will be advised that if they choose a carrier other than their existing intraLATA 1+ carrier, they must fill out and return the response form postmarked by July 12, 1999. Those customers choosing to stay with their existing intraLATA 1+ carrier will not have to return the response form. Their intraLATA 1+ service will remain with their current provider. Based on the customer response forms received and any letters of agency received directly from participating carriers, Heartland Communications, Inc., as of the date and time that intraLATA dialing parity is implemented, will execute all necessary carrier selection changes.

Customers will not be charged for making any change to their intraLATA 1+ carrier during the presubscription process. In addition, customers will be advised that they will be given 60 days after the intraLATA toll dialing parity implementation date to change their intraLATA 1+ carrier at no charge.

B. New customers.

New customers to Heartland Communications, Inc. local exchange service, commencing such service after July 22, 1999, will be asked to choose both an intraLATA and interLATA carrier. They will be informed that regulations require that they choose a carrier for their intraLATA 1+ service (for calls within this LATA) and also choose a carrier for their interLATA 1+ service (for calls going outside this LATA). Heartland Communications, Inc. will either inform or provide new customers a list of all carriers participating in intraLATA 1+ services and all carriers participating in interLATA 1+ services. Customer service representatives of Heartland Communications, Inc. will reference the names of all carriers in the customer's exchange area providing 1+ toll service. If the customer requests, the customer service representative will provide contact telephone numbers for the available carriers. Lists used by the customer service representatives will contain carriers' names in random order.

Customers applying for service will be encouraged to make a carrier selection. New customers will make an affirmative selection before they will be assigned to any carrier for either their intraLATA 1+ or interLATA 1+ service. New customers will be advised that neither intraLATA 1+ dialed calls or interLATA 1+ dialed calls originated from the customer's local line will be possible until a carrier selection is made. Until a selection is made, non-selecting customers will need to dial a carrier access code to make either intraLATA or interLATA toll calls.

7. Request for approval of Plan.

Heartland Communications, Inc. asks that the Commission grant its official approval of this Plan no earlier than June 22, 1999.

Dated this 19 day of April, 1999.

Respectfully submitted,

Mark D. Benton, Manager Heartland Communications, Inc.

Heartland Communications, Inc. IntraLATA Dialing Parity Timeline

Carrier notifications completed by: June 1, 1999

Carrier responses due by: June 16, 1999

Customer notification completed by: June 25, 1999

Due date for customer response forms: July 12, 1999

IntraLATA dialing parity implementation date: July 22, 1999

End of 60 day grace period: September 20, 1999

APPENDIX A

Date

TO: All Long Distance Carriers of Record in the State of South Dakota

Heartland Communications, Inc. (HCI) is pleased to announce the provisioning of IntraLATA equal access in certain local exchange areas. A list of these exchanges is attached. This service will be made available to customers on July 22, 1999.

It is HCI's intent to work closely with all users of access and maintain an impartial position with regard to the end user's selection of an IntraLATA long distance carrier. HCI will supply a PIC list for the end user's selection of an IntraLATA long distance carrier. HOW wer, because IntraLATA equal access will be provisioned via South Dakota Network (SDN) at 2900 West 10th Street, Sioux Falls, SD 57 104, interconnection and access may be ordered via SDN.

Please complete and return the attached form if you wish to be a carrier of choice on the IntraLATA equal access PIC list for the exchanges listed on the next page.

Questions may be directed to Peg Reinesch at 605.778.6221.

You must return your request for participation postmarked no later than June 16, 1999, to:

Peg Reinesch Heartland Communications, Inc. PO Box 48 Kimball, SD 57355 Fax: 605.778.8080

Sincerely,

Mark D. Benton, Manager

cc: Bill Bullard, South Dakota Public Utilities Commissio .

TOWN	NPA	NXX
Platte	685	337

Heartland Communications, Inc. exchanges to provide IntraLATA equal access:

APPENDIX B

INTRALATA PIC LIST PARTICIPATION FORM FOR Heartland Communications, Inc.

CARRIER NAME	
ACNA	-
CIC	
BILLING ADDRESS	
BILLING CONTACT	
PHONE NUMBER	
FAX NUMBER	
E-MAIL ADDRESS	
CUSTOMER SERVICE NUMBER (BUSINESS)	
CUSTOMER SERVICE NUMBER (RESIDENCE)	
WOULD YOU LIKE TO BE INCLUDED ON THE INTRALATA PIC LIST?	YES
SIGNATURE	
TILE	
DATE	

Please respond by June 16, 1999.

Address: Contact Name XYZ Telephone Company Address - City, State, Zip

TOWN	NPA	NXX
Platte	605	337
		-

Heartland Communications, Inc. exchanges to provide IntraLATA equal access:

APPENDIX B

INTRALATA PIC LIST PARTICIPATION FORM FOR Heartland Communications, Inc.

CARRIER NAME	
ACNA	-
CIC	
BILLING ADDRESS	
BILLING CONTACT	
PHONE NUMBER	
FAX NUMBER	
E-MAIL ADDRESS	
CUSTOMER SERVICE NUMBER (BUSINESS)	
CUSTOMER SERVICE NUMBER (RESIDENCE)	
WOULD YOU LIKE TO BE INCLUDED ON THE INTRALATA PIC LIST?	YES
SIGNATURE	
TILE	
DATE	

Please respond by June 16, 1999.

Address: Contact Name XYZ Telephone Company Address - City, State, Zip Date:

To: All Customers of XYZ Telephone Company

XYZ Telephone Company is pleased to announce that effective July 22, 1999, we will make it possible for you to choose from various long distance companies for your in-state 1+ long distance aervice (intraLATA long distance service). This service includes all of your intrastate long distance calls made by dialing 1 plus the area code and local telephone number. With these changes, you will have the ability to select a long distance company for your in-state 1+ long distance service.

In conjunction with making these changes, XYZ Telephone Company is asking all of its local exchange subscribers to choose whether they wish to retain the current long distance company providing their in-state 1+ long distance service or select another company for the service.

Currently [name of current 1+ intraLATA provider] provides your in-state 1+ long distance service. This company will continue to provide service to you unless you tell us to make a change and select another carrier. If you do nothing, your in-state 1+ long distance service will remain with [name of current intraLATA provider].

Attached is a list of long distance companies, in addition to [name of current intraLATA provider], that have agreed to provide 1+ in-state long distance services in your area. If you would like one of these other companies to provide your service, please complete the customer response form that is also attached and return it to our business office postmarked by no later than July 12, 1999.

You will not be charged for making a change to your existing in-state 1+ long distance service in response to this notice. In addition, for a period of 60 days after July 22, 1999, you may decide to change your in-state 1+ long distance carrier, one time, at no charge. After September 20, 1999, you will incur a Primary Interexchange Carrier (PIC) charge of \$_____ for changing carriers.

Please call our office at 605 - _____ if you have any questions on this matter.

Sincerely,

XYZ Telephone Company

LIST

Listed below are the other Long Distance companies that are willing to offer you IntraLATA 1+ (generally in-state) long distance services. If you wish to change your intraLATA 1+ long distance carrier, please complete the attached form and return it postmarked by July 12, 1999, to XYZ Telephone Company, Address, City, State, Zip.

ABC Telephone Company, Inc. Bus/Res: 1-800-555-1234

LMNOP Telecommunications Bus: 1-800-555-2345

ZXC Telephone Company Bus/Res: 1-800-555-3456

Please respond on or before July 12, 1999.

(Revised Version) APPENDIX D

In-State 1+ Long Distance Service (IntraLATA Long Distance Service) Customer Response Form (Please print)

Subscriber Billing Name:

Billing Address:

(City, State, Zip)

Please change my long distance company for in-state (IntraLATA) 1+ long distance calls:

Telephone Number(s)

I authorize XYZ Telephone Company to make the above carrier change(s). I understand that only one carrier may be designated as my intraLATA or in-state preferred interexchange carrier (PIC) for any one telephone number.

X Subscriber's Signature (Required)

X Date (Required)

NOTE: You do not need to return this form if you wish to retain your current intraLATA or 1+ in-state long distance carrier, [name of current 1+ intraLATA carrier.]

Carrier Name



April 19, 1999

RECEIVED

APR 2 2 1999

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

Mr. Bill Bullard Executive Director South Dakota Public Utilities Commission 500 East Capitol Avenue Pierre, SD 57501 (605) 773-3201

Dear Bill:

Please find enclosed the original and ten hard copies of the Dialing Parity Plan for Midco Communications, Inc. as ordered under TC99-030. I have also sent an e-mail attachment in MS Word to your attention as requested. Please let me know if you require anything further, or if the transmittals arrive at your office in anything other than perfect condition.

Best regards.

Sincerely, Midco Communications

W. Tom Simmons Vice President & General Manager

BEFORE THE PUBLIC UTILITIES COMMISSISON OF THE STATE OF SOUTH DAKOTA

۱

)

)

IN THE MATTER OF THE FCC ORDER ESTABLISHING NEW DEADLINES FOR IMPLEMENTATION OF INTRALATA DIALING PARITY BY LOCAL EXCHANGE CARRIERS TC99-030 MIDCO COMMUNICATIONS INTRALATA TOLL DIALING PLAN

Pursuant to the Order of the South Dakota Public Utilities Commission, Midco Communications hereby submits this intraLATA toll dialing plan for Commission review and approval, according to the guidelines ordered April 2, 1999:

 a description of how the LEC will offer dialing parity for each exchange and its proposed time schedule;

Currently, Midco Communications provides local exchange service only as a reseller of US West services under an approved agreement on file with the South Dakota Public Utilities Commission. Midco's ability to offer dialing parity depends in large part on the dialing parity plan developed by US West. Subject to coordination with the US West plan, Midco intends to support intraLATA dialing parity in the same manner it currently supports interLATA dialing parity in each US West exchange.

Midco Communications also intends to provide facilities based local service in selected US West exchanges. The details of providing that service is contained in an interconnection agreement between Midco Communications, Inc. and US West, Inc., pending approval of the South Dakota Public Utilities Commission (Docket TC99-023). Section 11 of the Agreement addresses dialing parity, offering the full two-PIC option in conformance with Section 271 of the Telecommunications Act. The Agreement also guarantees that for resale, or when Port/Switching Services are provided by US West, any end-user will be able to access the Midco network for services using the same dialing protocol that the end user would use to access the same service on the US West network.

2) a proposal for timely notification of its subscribers and the methods it proposes to use to enable subscribers to select an intraLATA toil provider, including the language the LEC proposes to use in its customer notification letter. The proposals shall include notification to current customers and new customers who join the network after the implementation of dialing parity;

Within thirty days following the approval of this plan, Midco Communications will notify current customers of options to select an intraLATA toll provider through a "Customer Notification Letter". The specific language of the "Customer Notification Letter" follows as Exhibit A. Additionally, within thirty days following the approval of this plan, Midco Communications will modify its Letter of Authorization (LOA) to confirm the customers choice of providers for: 1) Local exchange service, 2) IntraLATA toll, and 3) InterLATA toll service. The specific language of follows as Exhibit B.

 a LEC that is not a BOC must identify the LATA with which it will associate for the purposes of providing intraLATA and interLATA toll dialing parity; In all cases, Midco Communications is associated with LATA 640, NPA 605.

a description of how carriers will be informed of the implementation process and schedule and how carriers may participate in the process;
 Midco Communications will notify all long distance carriers of record in the State of South Dakota of its implementation process and schedule through a letter.
 The specific language follows as Exhibit C.

 a description of how the LEC's business office will handle requests to change carriers.

Requests to change carriers will be handled by the central processing department, Carriers must send or fax a completed PIC Change Request Form. A sample follows as Exhibit D.

Dated this 21st day of April, 1999.

Respectfully submitted,

W.Xom Simmons Vice President & General Manager Midco Communications, Inc. 410 South Phillips Avenue Sioux Falls, SD 57104 Telephone (605) 334-1200

Exhibit A

Customer Notification Letter

Thank you for choosing Midco Communications as your provider for local exchange telephone services. In keeping with the provisions of Section 251 (b)(3) the Telecommunications Act of 1996, Midco Communications is required to inform you that you have a choice in selecting providers of intraLATA (in state long distance) and interLATA (out of state long distance) providers. The choice may include Midco Communications, or any other long distance carrier of record in the state of South Dakota who have indicated a desire to be a carrier of choice on the IntraLATA/InterLATA PIC lists.

Please confirm your choices for telephone service providers below by indicating the name of the provider along with your signature and the date:

My local exchange provider is:

Midco Communications

	Ву
My IntraLATA (in state long distance provider is:	Date:
	Ву
My InterLATA (out of state long distance provider is:	Date:
	Ву
	Date:

If the confirmation of providers above represents a change in providers, there may be charges incurred for changing the PICs, and there may be monthly surcharges.

If you have questions, please do not hesitate to call our customer service department at 605-334-1200 or 1-800-888-1300.

Sincerely, Midco Communications

W. Tom Simmons Vice President & General Manager EXHIBIT B

Date:____

Company Name:_____

Address:		

City, State, Zip:_____

Phone:____

Midco Communications, Inc. 410 South Phillips Avenue Sioux Falls, SD 57104-6824

Dear Midco Communications:

This letter authorizes Midco Communications, Inc., to act as our local exchange carrier. I understand that we have a choice in selecting providers of intraLATA (in state long distance) and interLATA (out of state long distance) services. The choice may include Midco Communications, or any other long distance carrier of record in the state of South Dakota who have indicated a desire to be a carrier of choice on the IntraLATA/InterLATA PIC lists.

My IntraLATA (in state long distance) provider is: My InterLATA (out of state long distance) provider is:

By

By_____

Date:

Date:

We authorize Midco to make appropriate changes for all lines at the address listed above, and understand and agree to any charges that may be incurred for changing lines and PIC's to Midco or other choices indicated above.

Sincerely,

(Company representative)

Date:

EXHIBIT C

Month 00, 1999

To: All Long Distance Carriers of Record In the State of South Dakota

Per the requirements of Section 251(b)(3) of the Telecommunications Act of 1996, Midco Communications announces provisioning of IntraLATA and InterLATA equal access and dialing parity in the following South Dakota exchanges:

TBA

Midco Communications will work closely with all carriers of record expressing an interest to be a carrier of choice. If you are interested in receiving a copy of our manual, which details ordering procedures, terms and conditions for the provision of Feature Group D, Switched Access Service, and provides the required forms and time tables, please complete and return or fax the enclosed request form to:

> Sharon Stettnichs Manager – Central Processing Midco Communications 410 South Phillips Avenue Sioux Falls, SD 57104-6824 Fax: (605) 357-5423

If you have questions, you may contact Sharon Stettnichs at (605) 334-1200.

Sincerely, Midco Communications

W. Tom Simmons Vice President & General Manager



REQUEST FORM IntraLATA/interLATA Equal Access and Dialing Parity Manual

To: Sharon Stettnichs Manager – Central Processing Midco Communications, Inc. 410 South Phillips Avenue Sioux Falls, SD 57104-6824 Phone: (605) 334-1200 Fax: (605) 357-5423

Sharon:

Please send us your manual for intraLATA/interLATA equal access and dialing parity with Midco Communications.

Company Name:	
Contact Name:	
Address:	
City, State, Zip:	
Telephone Number:	
Fax Number:	
e-mail:	@



EXHIBIT D

PIC CHANGE REQUEST FORM

Use this form to submit intraLATA/interLATA PIC change requests to Midco Communications Central Processing.

Carrier Name:_____ CIC Code:_____

Contact Name: Contact Telephone:

Fax Number:_____ LOA ON FILE (Date) _____

er v Solden og Solden	WTN	Thter LATA	Antra LATA	Charge- PSP-to	Effective Date	input
		PIG	1 Processor	Carrier		
		-				
		+				
		-				
	_					
		-	-			

ATTN: MIDCO CENTRAL PROCESSING (FAX): (605) 357-5423

Michel L. Singer Senior Attorney



1875 Lawrence St. Denver, CO 80202

RECEIVED

APR 2 2 1999

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

April 21, 1999

Via Overnight Delivery

Mr. Bill Bullard Executive Director SD Public Service Commission 500 East Capital Avenue Pierre, SD 57501

Re: Implementation of Dialing Parity, Docket No. TC99-030

Dear Mr. Bullard:

Enclosed are an original and ten copies of AT&T Communications of the Midwest Inc.'s Dialing Parity Implementation Plan and Request for Approval of the Plan as required by the Commission's March 25, 1999 Order in the above referenced docket. An electronic copy in Word97 format has also been e-mailed to the Commission for inclusion on its web site.

Please feel free to call me if there are any questions.

Sincerely

Enclosures

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF SOUTH DAKCTA

IN THE MATTER OF THE FCC EST ABLISHING NEW DEADLINES FOR IMPLEMENTATION OF INTRALATA DIALING PARITY BY LOCAL EXCHANGE CUSTOMERS

)) DOCKET NO. TC99-030

AT&T'S REQUEST FOR APPROVAL OF DIALING PARITY IMPLEMENTATION PLAN

)

)

AT&T Communications of the Midwest, Inc. ("AT&T") hereby files this Dialing Parity Implementation Plan, incorporated herein as Attachment A, in accordance with the South Dakota Public Utilities Commission's Order Opening Docket and Setting Procedural Schedule issued March 31, 1999, and the Commission's Order Setting Guidelines issued April 2, 1999. This Plan sets forth AT&T's proposal for providing intraLATA toll dialing parity within the state of South Dakota for customers subscribing to the AT&T Digital Link Service.

WHEREFORE, AT&T requests that the Commission approve AT&T's Dialing Parity Plan for the AT&T Digital Link Service.

Respectfully submitted this 21" day of April, 1999.

AT&T COMMUNICATIONS OF THE MIDWEST, INC.

Maria Adas-Chapleau

Michel Singer AT&T Law Department 1875 Lawrence Street, Suite 1500 Denver Colorado 80202 Telephone: 303-298-6527 Facsimile: 303-298-6301

ATTACHMENT A

AT&T'S DIGITAL LINK DIALING PARITY IMPLEMENTATION PLAN

I. Introduction

AT&T hereby files this Dialing Parity Implementation Plan in accordance with the Federal Communications Commission Order released on March 23, 1999, in Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, Petition of Southwestern Bell Telephone Company, Pacific Bell, and Nevada Bell for Expedited Declaratory Ruling on Interstate IntraLATA Toll Dialing Parity or, in the Alternative, Various Other Relief, CC Docket No. 96-98, NSD File No. 98-121. This Plan sets forth AT&T's proposal for providing intraLATA toll dialing parity within the state of South Dakota for customers subscribing to AT&T Digital Link Service.

II. Methodology

AT&T will provide full 2-PIC (intraLATA toll & interLATA) dialing parity, allowing AT&T Digital Link Service customers to pre-subscribe to one carrier for all interLATA calls and to the same or another carrier for all intraLATA toll calls. One interLATA IXC and one intraLATA IXC may be selected for each trunk subgroup. AT&T will convert all its central offices on a statewide basis. AT&T will provide the capability for pre-subscription, however subscribers must reprogram their PBX to send their traffic to their selected carrier in order for the presubscribed choice to be effective.

III. Availability

AT&T will provide full 2-PIC dialing parity in each LATA in which AT&T offers AT&T Digital Link Service. This service is being offered in South Dakota within U S WEST's territory and concurs with U S WEST's exchange areas and exchange maps filed by U S WEST with the South Dakota Public Utilities Commission.

IV. Subscriber Practices

AT&T will provide notice to its AT&T Digital Link Service subscribers of the forthcoming availability of intraLATA toll and interLATA dialing parity by means of a one-time mailing, a copy of which is attached as Exhibit 1. This mailing will be sent 30 days prior to the implementation of dialing parity, provided that at least one ASR has been received from an alternate carrier.

AT&T will inform new AT&T nodal services and AT&T Digital Link Service customers (i.e., customers that subscribe to local and long distance services on the same day) of the dialing parity feature available to them and, upon request, will provide customers a randomly ordered list of carriers available to them in their geographic area. If the new customer does not indicate a preference for an alternate carrier, interLATA and intraLATA toll traffic sent over AT&T Digital Link nodal facilities will be carried over AT&T's network as part of the subscribers' new nodal agreement.

AT&T will utilize competitively neutral business office practices when an existing AT&T Digital Link Service subscriber contacts AT&T to request information on dialing parity or to change to an alternate intraLATA toll and/or interLATA provider. Upon request, AT&T will provide customers a randomly ordered list of carriers available to them in their geographic area. Existing subscribers who do not affirmatively select an alternative provider will remain with their pre-existing intraLATA toll and interLATA carrier. Unless an existing AT&T Digital Link Service subscriber requests a change to his or her presubscribed interexchange carrier ("PIC") or to his or her presubscribed interLATA toll carrier ("PTC"), any interLATA and intraLATA toll traffic sent over AT&T Digital Link nodal facilities will continue to be carried over AT&T's network.

AT&T will accept customer-initiated or carrier-initiated requests for alternate interLATA or intraLATA toll carrier on the date of implementation. If all necessary access facilities already exist, the PIC/PTC selection will be processed within three business days. Should the installation of new access facilities (e.g., from the AT&T switch to the LEC access tandem or from the customer premises to the AT&T switch) be required, the PIC/PTC selection will be completed within three business days of the new facilities being fully provisioned and operational. The new facilities will be provisioned within standard provisioning intervals.

At this time, AT&T will not impose charges on its customers for pre-subscribing to an alternate carrier or for changing their PIC/PTC selection.

V. Carrier Practices

AT&T will notify all Feature Group D carriers operating in South Dakota no later than 60 days prior to the implementation of dialing parity. A copy of the carrier notification letter is attached hereto as Exhibit 2.

Any interexchange carrier that wishes to be listed as a provider of intraLATA toll or interLATA service at the time of dialing parity implementation shall notify AT&T no later than 30 days prior to dialing parity availability. ASR requirements are available from the AT&T Carrier Service Center. AT&T will implement ASRs that require the installation of new access facilities in accordance with stanc and provisioning intervals.

VI. Proposed Implementation Schedule

AT&T will implement dialing parity no later than 30 days after the date on which this plan is approved.

Exhibit 1

Date

Dear Customer,

As a valued AT&T Digital Link customer we are pleased to announce an enhancement to your AT&T Digital Link Service: the availability of intraLATA toll and interLATA (including international) pre-subscription. Pre-subscription gives you the opportunity to choose an alternate carrier to complete your intraLATA toll and/or interLATA calls.

AT&T currently completes your intraLATA toll and 1+ interLATA calls, and will continue to be your long distance company unless you choose otherwise.

Other companies will solicit your intraLATA toll and interLATA business. Before making a change, however, please remember that each company's rates, plans and policies are different. We encourage you to contact any long distance company that you are interested in to discuss their services in detail. Since AT&T Digital Link Service is an extension of your existing AT&T Long Distance Service, changing long distance carriers could affect your volume discount structure. You should also consider contacting your AT&T account representative for further details on the effect switching long distance companies would have on your discount structure and your ability to meet your current long distance usage commitments, if any.

If you wish to make a change, please contact our business office. You should also contact the long distance company you have chosen to ensure your account is properly established. This feature is available to you effective [date]. AT&T will not impose any charges for this feature.

As always, we are grateful for your continued business. If you have any questions or wish to make a change, please contact our business office at 1-877-325-5968 on or after [date].

Sincerely,

AT&T Local Services

Exhibit 2

Date:

To: All IntraLATA and InterLATA Carriers.

The purpose of this correspondence is to provide formal notification of AT&T's intention to offer IntraLATA and InterLATA Dialing Parity.

Effective [date] AT&T Digital Link Customers will be permitted to pre-subscribe to alternate and/or separate IntraLATA and InterLATA Carriers.

Carriers interested in participating in this offer should submit the appropriate Access Service Request (ASR) forms to the AT&T Carrier Service Center (CSC) by [date].

Requests for additional information or ASR submission may be directed to AT&T's CSC at the following address:

> AT&T CSC 900 Ftes 202/206 North Room 5C250 Bedn inster, NJ 07921-0752 Tel no. 908 234-7480 Fax no. 908 719-7229

Sincerely,



Martin and Associates, Inc.

RECEIVED

CONSULTANTS . PROFESSIONAL ENGINEERS . COMPUTER SPECIALISTS

APR 2 2 1999

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

Memo

To: Bill Bullard From: Janice Christenson Date: April 21, 1999 Subject: Intralata Equal Access

Please disregard the Intralata Implementation Plan that you received from Stockholm-Strandburg Telephone Co. earlier in the week. Please replace it with the enclosed plan.



Stockholm Strandburg Telephone Co.

210 N. Main St. PO Box 20 Stockholm, South Dakota 57264-0020 Phone 605-676-2311

RECEIVED

APR 7 2 1999

April 19, 1999

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

Bill Bullard, Executive Director South Dakota Public Utilities Commission State Capitol Building 500 East Capitol Ave. Pierre, South Dakota 57501

RE: Docket TC99-030 (Implementation Plan for IntraLATA Dialing Parity)

Dear Bill:

Enclosed for filing in the above referenced Docket is the "Implementation Plan for IntraLATA Toll Dialing Parity" of Stockholm-Strandburg Telephone Co.

Please note that we have indicated a date for sending carrier notification letters that is in advance of the requested plan approval date. We've done this because of certain language in the FCC's March 23rd IntraLATA Dialing Parity Order, FCC 99-54, which indicates that LECs must implement intraLATA dialing parity within 30 days after approval of their implementation plan. This would seem to mean that the actual conversion to dialing parity should be accomplished within 30 days after this Commission approves the plan. Given this very short timeline, if LECs are not able to start the cautier notification process in advance of final Commission action on the plan, almost no time would be left for notifying and receiving responses from customers.

We are therefore, along with requesting approval of this filed plan, asking that the Commission grant us approval in advance of its final action on the plan to send out carrier notification letters. A sample copy of the carrier notification letter proposed for use is attached to the implementation plan as Appendix A. A sample copy of the proposed carrier participation form to be used is included with the plan as Appendix B.

If Commission Staff or the Commissioners desire any additional information to supplement this filing, please advise.

Thank you for your assistance in filing and distributing these documents.

Sincerely, Har ld Hourch

Manager, Stockholm-Strandburg Telephone Co.

IMPLEMENTATION PLAN FOR INTRALATA TOLL DIALING PARITY

Stockholm-Strandburg Telephone Co. (hereinafter referenced as "Stockholm-Strandburg") submits this Implementation Plan for IntraLATA Toll Dialing Parity (hereinafter referenced as "the Plan") pursuant to 47 C.F.R. § 51.213 and recent Orders of the South Dakota Public Utilities Commission (hereinafter referenced as the "Commission") which require this filing on or before April 22, 1999. The purpose of the Plan is to provide information to the Commission concerning how and when Stockholm-Strandburg will convert to intraLATA toll dialing parity, or, as it is sometimes called, intraLATA equal access. The provisioning of such capability will permit customers to select which long distance carrier they want to handle their intraLATA 1+ calls.

1. Company name and address:

Stockholm-Strandburg Telephone Co., 210 N. Main St., Stockholm, SD 57264 Phone: 605-676-2311 Fax: 605-676-2317

2. Associated LATA:

Stockholm-Strandburg is located in and for purposes of this Plan associates with LATA 640.

3. Description of offering.

Stockholm-Strandburg will offer intraLATA toll dialing parity through the "full 2-PIC" presubscription software installed on a centralized basis at the access tandem switch of South Dakota Network, Inc. ("SDN"). The "full 2-PIC" method of presubscription allows a customer to presubscribe to one long distance carrier for all 1+ intraLATA toll calls and to presubscribe to the same or another long distance carrier for all 1+ interLATA toll calls. Because the intraLATA toll dialing parity capability will be provisioned via SDN at 2900 West 10th, Sioux Falls, SD 57104, interconnection and access necessary for participation in the offering may be ordered by long distance carriers via SDN.

4. Included local exchange areas and conversion date.

IntraLATA toll dialing parity through SDN will be made available in the following local exchange areas beginning July 22, 1999:

EXCHANGE	NPA	NXX	
Revillo	605	623	
South Shore	605	756	
Stockholm	605	676	

1

5. Interexchange carrier "carrier" notification.

All carriers certified in South Dakota to provide long distance services will be notified by June 1, 1999, of the conversion to intraLATA toll dialing parity (a sample copy of the carrier notification letter to be used is attached hereto as Appendix A). These carriers will be asked to respond by June 16, 1999, if they want to participate in the intraLATA toll presubscription process (a sample copy of the form which carriers will complete to indicate their participation in the presubscription process is attached hereto as Appendix B). For those carriers that choose to participate in the presubscription process, information regarding customer choices will be forwarded by the local exchange carrier to the participating carriers through the "Customer Account Record Exchange" ("CARE") process in place today for exchanging information regarding interLATA toll selections. The CARE process allows for a regular reporting via magnetic tape or facsimile transmission of customer carrier selections between local exchange carriers.

Stockholm-Strandburg will also provide a summary report that will list all carrier selections received for the long distance carrier for whom the report is prepared. This report will be mailed, at the participating long distance carrier's request, in advance of the intraLATA dialing parity implementation date.

Stockholm-Strandburg will make available preconversion customer name and address lists. These customer lists are available to assist participating carriers in their presubscription solicitation efforts. These lists may be provided subject to a reasonable, non-discriminatory fee, with delivery contingent upon the carrier meeting all requirements for participation in the intraLATA presubscription process.

6. Customer notifization.

A. Current customers.

Customers will be notified of the conversion to intraLATA toll dialing parity by letter postmarked by no later than June 25, 1999. In such letter, customers will be advised of their intraLATA choices. Customers will be given the option to remain with their existing intraLATA 1+ carrier, Express Communications d.b.a. Stockholm-Strandburg Long Distance, or to choose a different intraLATA carrier for their 1+ service. The letter will include a list indicating all carriers in addition to the existing 1+ carrier that have chosen to participate in the intraLATA toll presubscription process (a sample copy of the customer notification letter that will be used is attached hereto as Appendix C).

Stockholm-Strandburg will include wit the customer notification letter a customer response form (a sample copy of the customer response form to be used is attached hereto as Appendix D). Customers will be advised that if they choose a carrier other than their existing intraLATA 1+ carrier, they must fill out and return the response form postmarked by July 12, 1999. Those customers choosing to stay with their existing intraLATA 1+ carrier, will not have to return the response form. Their intraLATA 1+ service will remain with their current provider. Based on the

customer response forms received and any letters of agency received directly from participating carriers, Stockholm-Strandburg, as of the date and time that intraLATA dialing parity is implemented, will execute all necessary carrier selection changes.

Customers will not be charged for ma' ing any change to their intraLATA 1+ carrier during the presubscription process. In addition, customers will be advised that they will be given 60 days after the intraLATA toll dialing parity implementation date to change their intraLATA 1+ carrier at no charge.

B. New customers.

New customers to Stockholm-Strandburg's local exchange service, commencing such service after June 25, 1999, will be asked to choose both an intraLATA and interLATA carrier. They will be informed that regulations require that they choose a carrier for their intraLATA 1+ service (for calls within this LATA) and also choose a carrier for their interLATA 1+ service (for calls going outside this LATA). Stockholm-Strandburg will either inform or provide new customers a list of all carriers participating in intraLATA 1+ services and all carriers participating in interLATA 1+ services. Customer service representatives of Stockholm-Strandburg will reference the names of all carriers in the customer's exchange area providing 1+ toll service. If the customer requests, the customer service representative will provide contact telephone numbers for the available carriers. Lists used by the customer service representatives will contain carriers' names in random order.

Customers applying for service will be encouraged to make a carrier selection. New customers will make an affirmative selection before they will be assigned to any carrier for either their intraLATA 1+ or interLATA 1+ service. New customers will be advised that neither intraLATA 1+ dialed calls or interLATA 1+ dialed calls or interLATA 1+ dialed calls originated from the customer's local line will be possible until a carrier selection is made. Until a selection is made, non-selecting customers will need to dial a carrier access code to make either intraLATA or interLATA toll calls.

7. Request for approval of Plan.

Stockholm-Strandburg asks that the Commission grant its official approval of this Plan no earlier than June 22, 1999.

Dated this 19 day of April, 1999.

Respectfully submitted.

Harded Harrick

Manager, Stockholm-Standburg Telephone Co.

Stockholm-Strandburg IntraLATA Dialing Parity Timeline

Corrier notifications completed by: June 1, 1999

Carrier responses due by: June 16, 1999

Customer notification completed by: June 25, 1999

Due date for customer response forms: July 12, 1999

IntraLATA dialing parity implementation date: July 22, 1999

End of 60 day grace period: September 20, 1999

APPENDIX A

Date

TO: All Long Distance Carriers of Record in the State of South Dakota

Stockholm-Strandburg Telephone Co. (Stockholm-Strandburg) is pleased to announce the provisioning of IntraLATA equal access in certain local exchange areas. A list of these exchanges is attached. This service will be made available to customers on July 22, 1999.

It is Stockholm-Strandburg's intent to work closely with all users of access and maintain an impartial position with regard to the end user's selection of an IntraLATA long distance carrier. Stockholm-Strandburg will supply a PIC list for the end user's selection of an IntraLATA long distance carrier. However, because IntraLATA equal access will be provisioned via South Dakota Network (SDN) at 2900 West 10th Street, Sioux Falls, SD 57104, interconnection and access may be ordered via SDN.

Please complete and return the attached form if you wish to be a carrier of choice on the IntraLATA equal access PIC list for the exchanges listed on the next page.

Questions may be directed to Jan Christensen at Martin and Associates, Inc., 605-995-2576. Technical questions may be directed to Tim Nowick at Stockholm-Strandburg Telephone Co., 605-676-2311.

You must return your request for participation postmarked no later than June 16, 1999, to:

Janice Christensen Martin and Associates, Inc. 1515 N. Sanborn Boulevard Mitchell, SD 57301 Fax: 605-995-2577

5

Sincerely,

Name

cc: Bill Bullard, South Dakota Public Utilities Commission

Stockholm-Strandburg Telephone Co. exchanges to provide IntraLATA equal access:

TOWN	NPA	NXX
Revillo	605	623
South Shore	605	756
Stockholm	605	676

APPENDIX B

INTRALATA PIC LIST PARTICIPATION FORM FOR STOCKHOLM-STRANDBURG LELEPHONE CO.

CARRIER NAME	
ACNA	
CIC	
BILLING ADDRESS	
BILLING CONTACT	
PHONE NUMBER	
FAX NUMBER	
E-MAIL ADDRESS	
CUSTOMER SERVICE NUMBER (BUSINESS)	
CUSTOMER SERVICE NUMBER (RESIDENCE)	
WOULD YOU LIKE TO BE INCLUDED ON THE INTRALATA PIC LIST?	YES NO
SIGNATURE	
TITLE	
DATE	

Please respond by June 16, 1999.

Janice Christensen Martin and Associates, Inc. 1515 N. Sanborn Boulevard Mitchell, SD 57301 Fax: 605-995-2577

APPENDIX C

Date:

To: All Customers of Stockholm-Strandburg Telephone Co.

Stockholm-Strandburg Telephone Co. is pleased to announce that effective July 22, 1999, we will make it possible for you to choose from various long distance companies for your in-state 1+ long distance service (intraLATA long distance service). This service includes all of your intrastate long distance calls made by dialing 1 plus the area code and local telephone number. With these changes, you will have the ability to select a long distance company for your in-state 1+ long distance service.

In conjunction with making these changes, Stockholm-Strandburg Telephone Co. is asking all of its local exchange subscribers to choose whether they wish to retain the current long distance company providing their in-state 1+ long distance service or select another company for the service.

Currently, Express Communications d.b.a. Stockholm-Strandburg Long Distance provides your instate 1+ long distance service. This company will continue to provide service to you unless you tell us to make a change and select another carrier. If you do nothing, your in-state 1+ long distance service will remain with Stockholm-Strandburg Long Distance.

Attached is a list of long distance companies, in addition to Stockholm-Strandburg Long Distance, that have agreed to provide 1+ in-state long distance services in your area. If you would like one of these other companies to provide your service, please complete the customer response form that is also attached and return it to our business office postmarked by no later than July 12, 1999.

You will not be charged for making a change to your existing in-state 1+ long distance service in response to this notice. In addition, for a period of 60 days after July 22, 1999, you may decide to change your in-state 1+ long distance carrier, one time, at no charge. After September 20, 1999, you will incur a Primary Interexchange Carrier (PIC) charge of \$5.00 for changing carriers.

Please call our office at 605-676-2311 if you have any questions on this matter.

Sincerely,

Stockholm-Strandburg Telephone Co.

Listed below are the other Long Distance companies that are willing to offer you IntraLATA 1+ (generally in-state) long distance services. If you wish to change your intraLATA 1+ long distance carrier, please complete the attached form and return it postmarked by July 12, 1999, to Stockholm-Strandburg Telephone Co., 210 N. Main St., PO Box 20, Stockholm, SD 57264-0020.

ABC Telephone Company, Inc. Bus/Res: 1-800-555-1234

LMNOP Telecommunications Bus: 1-800-555-2345

ZXC Telephone Company Bus/Res: 1-800-555-3456

Please respond on or before July 12, 1999.

1.61

APPENDIX D

In-State 1+ Long Distance Service (IntraLATA Long Distance Service) Customer Response Form (Please print)

Subscriber Billing Name:

Billing Address:

(City, State, Zip)

Please change my long distance company for in-state (IntraLATA) 1+ long distance calls:

to

to

to

to

to

to

to

to

to

Telephone Number(s)

Carrier Name

the second s

and the second second

I authorize Stockholm-Strandburg Telephone Company to make the above carrier change(s). I understand that only one carrier may be designated as my intraLATA or in-state preferred interexchange carrier (PIC) for any one telephone number.

X Subscriber's Signature (Required)

X Date (Required)

NOTE: You do not need to return this form if you wish to retain your current intraLATA or 1+ in-state long distance carrier, Stockholm-Strandburg Long Distance. U S WEST, Inc. 1801 California Street, Suite 5100 Colorn In 101202 303 672-2783 Fectime 303 298-8197

VIA FEDERAL EXPRESS

Todd L Lundy Senitr ABSLWY

IIISWE

RECEIVED

APR 2 2 1999

April 21, 1999

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

Mr. William Bullard, Jr. Executive Director South Dakota Public Utilities Commission 500 East Capitol Avenue Pierre, SD 57501

In the Matter of the FCC Order Establishing New Deadlines for Implementation of RE: Intralata Dialing Parity by Local Exchange Carriers; Docket No. TC 99-030

Dear Mr. Bullard:

Enclosed for filing are an original and ten (10) copies of U S West Communications, Inc. South Dakota Intralata Toll Dialing Parity Implementation Plan.

Please return a date-stamped copy of the this letter in the enclosed self-addressed stamped envelope. Thank you for your cooperation.

Sincerel To dal Lundy

Enclosures



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF SOUTH DAKOTA

IN THE MATTER OF THE FCC ORDER) ESTABLISHING NEW DEADLINES FOR) IMPLEMENTATION OF INTRALATA) DIALING PARITY BY LOCAL EXCHANGE) CARRIERS)

0154 .30 .197

TC 99-030

RECEIVED

U S WEST COMMUNICATIONS, INC. SOUTH DAKOTA INTRALATA TOLL DIALING PARITY IMPLEMENTATION PLAN

APR 22 1999

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

April 22, 1999

By: Todel L. hundy

Todd L. Lundy Senior Attorney U S WEST, Inc. 1801 California, Suite 5100 Denver, CO 80202 (303) 672-2783 <u>Critical Dates:</u> Pursuant to the discussions among the parties and the Commissioner's during the April 1, 1999 Ad Hoc meeting, U S WEST requests that the Commission employ the following schedule for approval of the con. Jonents of U S WEST's Plan:

Filing: Plan and associated tariffs and studies	April 22, 1999
Commission Approval of Carrier Notification Process	May 20, 1999
Carrier Notification Occurs	May 23, 1999
Commission Approval of Customer Notification	June 1, 1999
Carrier Response Due	June 7, 1999
Customer Notification Mailing	June 22, 1999
Final Commission Plan Approval	June 22, 1999
Implementation Date	July 22, 1999

The accelerated schedule for carrier and customer notification is necessary to coordinate such notification with the date of implementation. Without this accelerated schedule, neither carriers nor customers will receive the appropriate notification by the date of implementation.

<u>Methodology:</u> US WEST will implement full 2-PIC intraLATA presubscription (ILP) toll dialing parity, thereby allowing end users to presubscribe to one carrier for all interLATA calls and the same or another carrier for all intraLATA calls. US WEST will convert all US WEST central offices in South Dakota on a statewide basis no later than July 22, 1999, based on Commission approval of US WEST's toll dialing parity plan no later than June 22, 1999.

U S WEST will file a waiver with the FCC requesting an extension of time to implement toll dialing parity in the following three exchanges: McIntosh (605-273), Timber Lake (605-865), and Morristown (605-524). These exchanges were the subject of sale of exchanges with the Cheyenne River Tribe, and will be converted at a later date. Customers in these exchanges will be notified separately to inform them of the extension of time and the implementation date

<u>Customer Notification</u>: U S WEST shall provide notice to its end user customers of the forthcoming conversion of its serving end offices to intraLATA equal access by means of a one time mailing prior to the scheduled implementation date. (See Exhibit A).

Lines Eligible for IntraLATA Presubscription: Residence, Business and Public Access Lines will be eligible for intraLATA presubscription. The individual responsible for the selection of the interLATA presubscribed carrier will also be responsible for the selection of intraLATA toll provider. Calls Eligible for IntraLATA Presubscription: 1+NPA/0+NPA designated intraLATA toll calls will be eligible for intraLATA presubscription.

<u>Calls Not Eligible for IntraLATA Presubscription</u>: The following call categories will continue to be carried over the U S WEST network, regardless of the intraLATA selection made for that line.

- Local calls, those defined as local calls in the tariff
- Directory Assistance calls placed without the use of an access code
- U S WEST Call Completion Service
- Calls to N11 codes (e.g., 411, 911) and 555 prefixed numbers
- Calls to Information Delivery Services (IDS) e.g., 960/976
- Calls completed by U S WEST operator (0-)
- Wireless and paging calls

Business Practices New Customers: U S WEST will inform new local exchange end users of their right to select the intraLATA carrier of their choice and agree to take their order for whichever provider they select.

If the customer is uncertain, U S WEST will read from a random list. Customers will be advised that U S WEST is a choice. Should the customer request information relative to U S WEST toll products and services, U S WEST will respond to the customer's request. Customers will be asked for their selection.

New customers who do not affirmatively select an intraLATA toll provider will not be assigned a carrier and vill be required to place intraLATA toll calls utilizing access codes e.g., 101XXXX, 950, 800, etc.

Business Practices Existing Customers: U S WEST will take orders from customers who contact U S WEST to request a change in intraLATA carrier in a competitively neutral manner. Should the customer request information relative to U S WEST toll products and services, U S WEST will respond to the customer's request.

Existing customers who do not affirmatively select an alternative intraLATA provider will remain with their pre-existing intraLATA toll carrier.

<u>Carrier Participation</u>: US WEST will keep carriers infor used of implementation details as appropriate. US WEST will notify all interexchange carriers that currently offer 1+ toll access in US WEST territory of its anticipated schedule for implementation of 1+ intraLATA equal access. This notification will follow the critical dates timeline addressed earlier in this plan. This notification will also include terms and conditions for an interexchange carrier to participate in intraLATA equal access.

Carriers requiring Feature Group D service should follow the normal Access Service Request process. Please see Exhibit B for a copy of this notice.

Order Processing: U S WEST will begin accepting carrier initiated changes for an intraLATA selection on the date of implementation. The Authorization Date (date the carrier received authorization from the customer to make the change on their behalf) may be no earlier than 30 days prior to the implementation date. Carriers will also receive a positive acknowledgment of the status of their request to change an end user's intraLATA carrier selection.

U S WEST customer contact personnel will be ready to accept changes from existing end user customers on the implementation date.

<u>Charge Application</u>: U S WEST's non-recurring charge for an intraLATA carrier change shall be set equal to the rate currently in effect for an interLATA carrier change charge (\$5.00). Customers shall be allowed one intraLATA carrier change free of charge during the first 30 days following implementation. After that date appropriate service order charges will apply.

Recovery of waived charges during this period will occur via the issuance of a one time bulk bill to each participating carrier. This bill will assess to them the PIC change charge for the total number of lines changed to that PIC.

An intraLATA PIC change charge will be assessed when customers change their carrier for intraLATA services.

The appropriate U S WEST filing(s) with respect to these charges are attached.

<u>Unauthorized PIC Changes "Slamming" Guidelines:</u> Slamming refers to an unacceptable business practice in which a carrier changes an end user's PIC without the end user's consent. Slamming typically occurs when a carrier submits a request to change an end user's PIC or ILP PIC directly to the end user's local exchange service provider and does not follow the appropriate guidelines to obtain the end user's authorization. U S WEST will follow the applicable federal and state regulations for obtaining the appropriate authorization for ILP PIC changes. U S WEST anticipates all participating carriers will also adhere to these rules and statues in marketing to South Dakota customers.

Customer "Slamming" Protection: Today, customers can ask U S WEST to prevent unauthorized interLATA carrier changes or "slamming" to their accounts by requesting an interLATA PIC freeze. A PIC freeze prevents an interLATA carrier from implementing an account change without the consumer contacting U S WEST directly. Originally, this option was only available at the account level not at the specific jurisdictional level (interLATA or intraLATA).

Effective with the implementation of dialing parity in South Dakota, current customers who have indicated a desire to control their interLATA carrier choices, will also have that control on their intraLATA carrier choice as well. This practice is consistent with U S WEST advocacy in all jurisdictions where toll dialing parity has been implemented. Thereafter, the protection will be controlled at the jurisdictional level instead of the account level. Customers will have the ability to protect either their interLATA or intraLATA carrier choices, or both. Any carrier change to a protected customer's account will uke direct action by the customer. The customer notification regarding intraLATA calling alternatives will include a description of how to make changes to a protected account. (see Exhibit A)

<u>Validation Number:</u> U S WEST will make available upon request from an end user, a toll free number they may call to verify their intraLATA provider. That number is 1 (home NPA) 700-4141. The recorded announcement received when an end user calls that number is the responsibility of the individual carrier. This number will work only for facility-based providers of long distance service.

Cost Recovery: During the April 1, 1999 Ad Hoc Meeting, the Commission commented that some carriers may require additional time to gather cost recovery information, and that cost recovery may involve the examination of evidence by interested parties and the Commission. Therefore, the Commission's April 2, 1999 Order states that, if a LEC believes that it needs cost recovery, the LEC should file for cost recovery in a separate proceeding before the Commission.

U S WEST is compiling the necessary information and will be submitting an application for cost recovery with the Commission. U S WEST requests as part of its Plan that the Commission approve U S WEST's recovery of costs starting on the date of implementation of dial ng parity. Cost recovery will coincide with the date of implementation, because other interexchange carriers begin to realize the benefits of U S WEST's expenditures when dialing parity becomes effective.

Following are the categories of intraLATA equal access conversion costs that are appropriate for U S WEST to recover:

- incremental cost of network hardware necessary to provide full 2-PIC methodology in all exchanges
- (b) central office upgrades
- (c) software translations
- (d) system programming/testing
- training of Business Office, Carrier Services, Customer Service and Service Center personnel
- (f) customer notification

Page 4

(g) any other implementation costs

1' S WEST will recover implementation costs excluding those recovered via the one time bulk-bill process outlined above over a three year period and will establish a new rate element referred to as the Equal Access Network Reconfiguration Charge (EANRC) to be assessed to all carriers. The recovery charge will be applied to the total intrastate intraLATA originating minutes of use for each carrier. U S WEST's cost projections will be subject to review annually and adjusted as appropriate to reflect any over or under recovery that may have occurred.

<u>Classification of U S WEST's IntraLATA Toll Services as Fully Competitive:</u> On November 2. 1992, the South Dakota Commission issued its Order Reclassifying Various Telecommunications Services, Docket No. TC92-026. In that Order, the Commission made extensive factual findings on the competitive nature of the intraLATA toll market. Based upon these findings, the Commission reclassified intraLATA toll services from emerging competitive to fully competitive for all carriers except U S WEST. The Commission stated that the non-existence of dialing parity created competitive advantages in favor of U S WEST, and therefore ruled that U S WEST's intraLATA services should remain classified as emerging competitive.

State-wide dialing parity is scheduled to be implemented on July 22, 1999. U S WEST will satist' the condition for classification of its intraLATA service as fully competitive with dialing parity implementation. Therefore, upon approval of U S WEST's toll dialing parity plan. U S WEST's intraLATA service should be classified as fully competitive to comply with SDCL 49-31-85.

NOTICE OF ALTERNATIVES FOR SOUTH DAKOTA IN-STATE CALLING

You may now choose from among many companies, including U S WEST, to handle your South Dakota in-state long distance calls effective July 22, 1999. Currently, U S WEST Communications is your provider for 1+ direct dialed calls within South Dakota.

If you choose to make a change, that change will only apply to calls made within South Dakota. This change will have no impact on long distance calls you place to locations outside South Dakota.

Should you decide to make a change, you may do so by contacting the business office of the company you wish to select. A list of companies you can choose from, including their toll free number, is included with this notice. You may change your in-state long distance provider one time through August 23, 1999 without incurring a carrier change charge. After that date appropriate service charges will apply.

If you do not elect to make a change, U S WEST will continue to be your provider for all 1+ long distance calls you make within South Dakota.

If you have requested U S WEST to protect your account from unauthorized changes to your long distance carrier, commonly referred to as "freezing", you must contact U S WEST (residence 1-800-244-1111 or business 1-800-603-6000) if you want to make a change. Tell the representative that your account is "frozen" and that you wish to change your in-state long distance carrier.

No action on your part is necessary if you want your in-state calls to remain with U S WEST, just as they are today.

This notice has been approved by the South Dakota Public Utilities Commission.

Exhibit B Page 1 of 3

U S WEST COMMUNICATIONS CARRIER SERVICE DELIVERY

May 23, 1999

TO: ALL ACCESS CUSTOMERS RE: 1+ INTRALATA IN SOUTH DAKOTA

SPECIAL ATTENTION RESPONSE REOUIRED BY JUNE 7, 1999

U S WEST Communications will implement statewide intraLATA equal access in South Dakota on July 22, 1999. It is U S WEST's intent to work closely with all access carriers and follow all prescribed processes with regard to the end user's selection of a long distance company.

U S WEST will be sending a one time mailing to end users in South Dakota informing them of the conversion to intraLATA equal access.

> You must submit the attached IntraLATA Equal Access Participation form if you wish to participate in IntraLATA Equal Access in South Dakota. The participation form must be faxed and received by close of business on June 7, 1999.

Note: If installation of Feature Group D trunks is required, the normal ASR (Access Service Request) process must be followed.

If you have not received acknowledgment of receipt of your form within 72 hours, please contact Harriett Berry on (303) 787-5593.

If you have any questions about the IntraLATA conversion, please contact your U S WEST Account Executive.

Georgiana Romero Manager Subscription Services Attachment

hberry@uswest.com

Exhibit B Page 2 of 3

U S WEST COMMUNICATIONS

South Dakota IntraLATA Equal Access Participation

Please submit a separate form for each CIC code.

If you want to participate in intraLATA Equal Access in South Dakota, this form must be completed and returned on or before June 7, 1999

FOUR DIGIT CIC

Carrier Listing Information

Please show carrier name and telephone number as it should be listed in U S WEST customer notification. The customer notification will include 1+ conversion information as well as a list of carriers who will be participating as intraLATA carriers.

Carrier Name:

Residence Participation (Y or N) ____

Carrier Telephone Number for Residence Customers

Business Participation (Y or N)

Carrier Telephone Number for Business Customers

Participation Contact Name and Number:

Please include the name and number of your company's participation contact.

Return FAX Number

Acknowledgment of receipt cannot be sent without fax number.

This form is for South Dakota participation only. If you wish to add or change your intraLATA participation in another state, you must fill out the participation form located in the Forms Section of the Regional Subscription System User Guide.

Return completed form to Harriett Berry; Fax: (303) 441-6064

Exhibit B Page 3 of 3

U S WEST COMMUNICATIONS

South Dakota IntraLATA Equal Access Participation Acknowledgment

Your South Dakota IntraLATA Equal Access Participation form has been received. You will be included in IntraLATA participation in South Dakota.

Harriett Berry Subscription Staff

South Dakota Public Utilities Commission WEEKLY FILINGS

For the Period of April 15, 1999 through April 22, 1999

If you need a complete copy of a filing faxed, overnight expressed, or mailed to you, please contact Delaine Kolbo within five business days of this filing. Phone: 605-773-3705 Fax: 605-773-3809

ELECTRIC

EL99-004 In the Matter of the Filing by MidAmerican Energy Company for Approval of a New Street Lighting Service.

MidAmerican Energy Company is filing to revise the South Dakota Electric Tariff No. 1 to include a price code for a 100-watt High Pressure Sodium Victorian style fiberglass pole street light.

Staff Analyst: Keith Senger Staff Attorney: Karen Cremer Date Filed: 04/21/99 Intervention Deadline: 05/07/99

TELECOMMUNICATIONS



In the Matter of the FCC Order Establishing New Deadlines for Implementation of IntraLATA Dialing Parity by Local Exchange Carriers.

The following local exchange carriers have filed IntraLATA Dialing Parity Implementation Plans: Heartland Telecommunications Company of Iowa on April 20, 1999; Accent Communications, Inc. on April 20, 1999, is requesting Commission approval to send out carrier notification letters in advance of final Commission action on the proposed plan, carrier notifications completed by June 1, 1999; Splitrock Properties, Inc. on April 21, 1999, is requesting Commission approval to send out carrier notification letters in advance of final Commission action on the proposed plan, carrier notifications completed by June 1, 1999; Jefferson Telephone Company on April 21, 1999, is requesting Commission approval to send out carrier notification letters in advance of final Commission action on the proposed plan, carrier notifications completed by May 10, 1999; Venture Communications, Inc. on April 21 1999, is requesting Commission approval to send out carrier notification letters in advance of final Commission action on the proposed plan, carrier notifications completed by June 1. 1999; Hanson County Telephone Company on April 21, 1999, is requesting Commission approval to send out carrier notification letters in advance of final Commission action on the proposed plan, carrier notifications completed by June 1, 1999; Hanson Communications, Inc. d/b/a McCook Telecom on April 21, 1999, is requesting Commission approval to send out carrier notification letters in advance of final Commission action on the proposed plan, carrier notifications completed by June 1, 1999; Vivian Telephone Company d/b/a Golden West Communications, Inc. on April 21, 1999, is requesting Commission approval to send out carrier notification letters in advance of final Commission action on the proposed plan, carrier notifications completed by June 1, 1999; Stockholm Strandburg Telephone Co. on April 22, 1999, is requesting Commission approval to send out carrier notification letters in advance of final Commission action on the proposed plan, carrier notifications completed by June 1, 1999; AT&T Communications of the Midwest, Inc. on April 22, 1999; Midco Communications on April 22, 1999; Heartland Communications, Inc. on April 22, 1999; Mobridge Telecommunications on April 22, 1999, is requesting Commission approval to send out carrier notification letters in advance of final Commission action on the proposed plan, carrier notifications completed by June 1, 1999; West River Telecommunications Cooperative on April 22, 1999, 's requesting Commission approval to

send out carrier notification letters in advance of final Commission action on the proposed plan, carrier notifications completed by June 1, 1999; Dakota Telecommunications Group, Inc., DTG Community Telephone, Inc. and Dakota Telecom, Inc. on April 22, 1999; Stateline Telecommunications, Inc. on April 22, 1999, is requesting Commission approval to send out carrier notification letters in advance of final Commission action on the proposed plan, carrier notifications completed by June 1, 1999; and U S WEST Communications, Inc. on April 22, 1999, "U S WEST will file a waiver with the FCC requesting an extension of time to implement toll dialing parity in the following three exchanges: McIntosh (605-273), Timber Lake (605-865), and Morristown (605-524). These exchanges were the subject of sale of exchanges with the Cheyenne River Tribe, and will be converted at a later date. Customers in these exchanges will be notified separately to inform them of the extension of time and the implementation date."

Staff Analyst: Harlan Best Staff Attorney: Karen Cremer Comments Due: 05/07/99 Reply Comments Due: 05/17/99

The following local exchange carriers have completed conversion to intraLATA dialing parity: Fort Randall Telephone Company on April 21, 1999; Mt. Rushmore Telephone Company on April 21, 1999; and CommChoice, LLC on April 22, 1999.

TC99-037 In the Matter of the Application of Long Distance America, Inc. for a Certificate of Authority to Provide Telecommunications Services in South Dakota.

Application by Long Distance America, Inc. for a certificate to provide 1+ and 101XXXX direct outbound dialing, 800/888 toll free inbound dialing and travel card interexhange service on a resold basis.

Staff Analyst: Dave Jacobson Staff Attorney: Camron Hoseck Date Filed: 04/15/99 Intervention Deadline: 05/07/99

TC99-038 In the Matter of the Application of FON Digital Network, Inc. for a Certificate of Authority to Provide Telecommunications Services in South Dakota.

On April 15, 1999, the Commission received an application by FON Digital Network, Inc. for a Certificate of Authority to provide telecommunications services in South Dakota. FON Digital Network, Inc. is a reseller which intends to offer 1+ and 101XXXX direct outbound dialing, 800/888 toll-free inbound dialing, travel card and prepaid calling card service.

Staff Analyst: Bob Knadle Staff Attorney: Karen Cremer Date Filed: 04/15/99 Intervention Deadline: 05/07/99

TC99-039 In the Matter of the Application of Concert Communications Sales LLC for a Certificate of Authority to Provide Local Exchange Services in South Dakota.

Concert Communications Sales LLC has filed a request for a Certificate of Authority to provide local telecommunications services on a resale basis throughout South Dakota. They plan to provide local telephone service, access service, private line, internet access service and data transmission services.

Staff Analyst: Michele Farris Staff Attorney: Camron Hoseck Date Filed: 04/19/99 Intervention deadline: 05/07/99

TC99-040 In the Matter of the Application of Cable & Wireless Global Markets, Inc. for a Certificate of Authority to Provide Telecommunications Services in South Dakota.

Cable & Wireless Global Markets, Inc. is a reseller who intends to offer interexchange interLATA and intraLATA telecommunication services on a statewide basis.

Staff Analyst: Keith Senger Staff Attorney: Karen Cremer Date Filed: 04/19/99 Intervention Date: 05/07/99

TC99-041 In the Matter of the Filing by Dickey Rural Telephone Cooperative and its Wholly Owned Subsidiary, Dickey Rural Communications, Inc. for Approval of Petition for Suspension and Modification of Dialing Parity.

Dickey Rural Telephone Cooperative and Dickey Rural Communications, Inc. each have fewer than 2% of the Nation's subscriber lines installed in the aggregate. Pursuant to 47 U.S.C. 251(f)(2), Dickey Rural Telephone Cooperative and Dickey Rural Communications, Inc. petitions the Commission for a suspension and modification of the requirement for implementation of intraLATA dialing parity in its service areas until June 30, 2000. The grounds for the petition are that suspension and modification are: a) necessary to avoid imposing requirements that are unduly economically burdensome and infeasible, and b) consistent with the public interest, convenience and necessity. The compressed schedule mandated by CC Docket No. 96-98, Order adopted March 19 and released March 23, 1999, FCC 99-54 is burdensome and infeasible for small LECs to develop and administer plans for timely notification of their subscribers and interexchange carriers regarding subscribers' selection of intraLATA toll providers, and for small LECs to develop fully compensatory local exchange access rates to replace the current arrangement.

Staff Analyst: Harlan Best Staff Attorney: Karen Cremer Date Filed: 04/19/99 Comments Due: 05/07/99 Reply Comments Due 05/17/99

TC99-042 In the Matter of the Filing by Consolidated Telephone Cooperative and its Wholly Owned Subsidiary, Consolidated Telcom, Inc. formerly known as CTC Communications, Inc. for Approval of Petition for Suspension and Modification of Dialing Parity.

Consolidated Telephone Cooperative and Consolidated Telcom, Inc. formerly known as CTC Communications, Inc. each have fewer than 2% of the Nation's subscriber lines installed in the aggregate. Pursuant to 47 U.S.C. 251(f)(2), Consolidated Telephone Cooperative and Consolidated Telcom, Inc. formerly known as CTC Communications, Inc. petitions the Commission for a suspension and modification of the requirement for implementation of intraLATA dialing parity in its service areas until June 30, 2000. The grounds for the petition are that suspension and modification are: a) necessary to avoid imposing requirements that are unduly economically burdensome and infeasible, and b) consistent with the public interest, convenience and necessity. The compressed schedule mandated by CC Docket No. 96-98, Order adopted March 19 and released March 23, 1999, FCC 99-54 is burdensome and infeasible for small LECs to develop and administer plans for timely notification of their subscribers and interexchange carriers regarding subscribers' selection of intraLATA toll providers, and for small LECs to develop fully compensatory local exchange access rates to replace the current arrangement. Staff Analyst: Harlan Best Staff Attorney: Karen Cremer Date Filed: 04/20/99 Comments Due: 05/07/99 Reply Comments Due: 05/17/99

TC99-043 In the Matter of the Filing by Kennebec Telephone Company for Approval of Dialing Parity Implementation Plan and Petition for Suspension and Modification of Dialing Parity.

Kennebec Telephone Company filed its intraLATA toll dialing parity implementation plan and, pursuant to ARSD 20:10:32:39 and 47 U.S.C. 251(f)(2), a petition for suspension and modification of the requirement for implementing intraLATA dialing parity until September 19, 1999. Kennebec Telephone Company has fewer than 2% of the Nation's subscriber lines installed in the aggregate. Kennebec Telephone Company's implementation of intraLATA dialing parity in Kennebec and Presho are part and parcel of its implementation of interLATA equal access for the Kennebec and Presho exchanges at the South Dakota Network switch in Sioux Falls. The implementation of Kennebec Telephone Company's dialing parity plan began before the FCC released its order in CC Docket No. 96-98, Order adopted March 19 and released March 23, 1999, FCC 99-54.

Staff Analyst: Harlan Best Staff Attorney: Karen Cremer Date Filed: 04/21/99 Comments Due: 05/07/99 Reply Comments Due: 05/17/99

TC99-044 In the lifetter of the Application of RDST, Inc. for a Certificate of Authority to Provide Telecommunications Services in South Dakota.

Application by RDST, Inc. for a Certificate of Authority to provide Intrastate Telecommunications Services in South Dakota. RDST, Inc. proposes to offer intrastate, interexchange 1+ and 101XXXX outbound, 800/888 inbound, travel card and prepaid card service in South Dakota.

Staff Analyst: Dave Jacobson Staff Attorney: Camron Hoseck Date Filed: 04/21/99 Intervention Deadline: 05/07/99

TC99-045 In the Matter of the Application of DSLnet Communications, LLC for a Certificate of Authority to Provide Telecommunications Services, Including Local Exchange Services, in South Dakota.

On April 21, 1999, the Commission received an application by DSLnet Communications, LLC for a Certificate of Authority to provide resold and facilities-based local exchange and interexchange services to subscribers throughout the state of South Dakota. Initially, DSLnet intends to provide data transmission services only.

Staff Analyst: Bob Knadle Staff Attorney: Karen Cremer Date Filed: 04/21/99 Intervention Deadline: 05/07/99

TC99-046 In the Matter of the Filing by Western Telephone Company for Approval of Dialing Parity Implementation Plan and Petition for Suspension and Modification of Dialing Parity. Western Telephone Company filed its intraLATA toll dialing parity implementation plan and, pursuant to ARSD 20:10:32:39 and 47 U.S.C. 251(f)(2), a petition for suspension and modification of the requirement for implementing intraLATA dialing parity until September 15, 1999. Western Telephone Company has fewer than 2% of the Natio.'s subscriber lines installed in the aggregate. "Western Telephone Company seeks the suspension and modification because at this time negotiations are ongoing and no decision has yet been reached regarding whether or not intraLATA equal access will be provided by South Dakota Network as centralized equal access, or, if Western Telephone Company will make the requisite changes to provide intraLATA dialing parity from its end offices. It is technically infeasible and, hence, inconsistent with the public interest, to reach this decision and implement either alternative by July 22, 1999, the deadline according to [the FCC order in CC Docket No. 96-98, Order adopted March 19 and released March 23, 1999,] FCC 99-54."

Staff Analyst: Harlan Best Staff Attorney: Karen Cremer Date Filed: 04/21/99 Comments Due: 05/07/99 Reply Comments Due: 05/17/99

TC99-047 In the Matter of the Filing by Beresford Municipal Telephone Company for Approval of Dialing Parity Implementation Plan and Petition for Suspension and Modification of Dialing Parity.

Beresford Municipal Telephone Company filed its intraLATA toll dialing parity implementation plan and, pursuant to ARSD 20:10:32:39 and 47 U.S.C. 251(f)(2), a petition for suspension and modification of the requirement for implementing intraLATA dialing parity until September 15, 1999. Beresford Municipal Telephone Company has fewer than 2% of the Nation's subscriber lines installed in the aggregate. "Beresford Municipal Telephone Company seeks the suspension and modification because at this time negotilations are ongoing and no decision has yet been reached regarding whether or not intraLATA equal access will be provided by South Dakota Network as centralized equal access, or, if Beresford Municipal Telephone Company will make the requisite changes to provide intraLATA dialing parity from its end offices. It is technically infeasible and, hence, inconsistent with the public interest, to reach this decision and implement either alternative by July 22, 1999, the deadline according to [the FCC order in CC Docket No. 96-98, Order adopted March 19 and released March 23, 1999,] FCC 99-54." Beresford Municipal Telephone Company submitted a centralized intraLATA equal access plan.

Staff Analyst: Harlan Best Staff Attorney: Karen Cremer Date Filed: 04/21/99 Comments Due: 05/07/99 Reply Comments Due: 05/17/99

> You may receive this listing and other PUC publications via our website or via internet e-mail. You may subscribe or unsubscribe to the PUC mailing lis ; at http://www.state.sd.us/puc/

TC99-030

Kadoka Telephone Co.

Box 220 • Kadoka, SD 57543 • (605) 837-2211

RECEIVED

APR 2 6 1999 SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

April 22, 1999

Bill Bullard Executive Director SD Public Utilities Commission 500 East Capitol Avenue Pierre, SD 57501

Dear Mr. Bullard:

This letter is to serve as notice that Kadoka Telephone Co. made a two pic equal access conversion at the end office on April 20, 1998. The timeline followed for the interlata and intralata conversion is enclosed.

Please contact me at (605) 837-2211 if you have any questions.

Sincerely,

May Bundt-

Mary Burnett Customer Service Representative

Copy: Patrick Morse-General Manager, Kadoka Telephone Co.

BOUAL ACCESS TIMELINE KADORA TELEPHONE COMPANY

PAGE 1 OF 2

OCTOBER 20, 1997

.....

Notification of end office(s) conversion will be mailed to IXCs of record on or before this date.

Opon request the following documents will be provided:

1. Notification letter.

2. Equal Access Timeline.

3. Equal Access End Office Information.

4. Access Service Request Requirements.

5. Sallot Listing Specification Form.

6. Allocation Participation Form.

Blanket Letter of Agency Statement.
 Customer Lists Order Form.

9. InterLATA Presubscription Plan.

10. Specifications for Data Exchange.

DECEMBER 22, 1997

Due from IXCs:

- 1. Letter of Intent.
- 2. Access Service Request.
- 3. Ballot Specification Form.
- 4. Interexchange Carrier Questionnaire.

End user education (if any) is begun.

Pre-Ballot Customer Universe available to ordering IXCs. IXC marketing activities begin to end users.

JANUARY 9, 1998

Sample Ballot will be available to requesting IXCs.

JANUARY 20, 1998

First Equal Access Ballots are mailed to customers.

IIC lists will begin to be accepted.

FEBRUARY 4, 1995

Pirat mandated report of customers is mailed to IXCs.

FRERUARY 15, 1998

First Equal Access Ballot deadline.

IXC list deadline to affect allocation.

Due from IXCs - Allocation Participation Form.

SEP-19-97 FRI 03:13 PM RVW INC.

FAX NO. 4025633655

P. 03

EQUAL ACCESS TIMELINE KADOKA TELEPHONE COMPANY

PAGE 2 OF 2

FEBRUARY 23, 1998

Second mandated report of customers is mailed to IXCs.

FEBRUARY 23, 1998

Tentative allocation of non-presubscribed customers.

Tentatively Allocated Customer List is mailed to ordering IXCs.

MARCH 11, 1998

· Second Equal Access Ballot is mailed with tentative allocation.

MARCH 31, 1998

Second Equal Access Ballot deadline.

Due from IXCs - IXC lists to be processed prior to conversion.

Deadline for all FIC, to be processed before conversion.

Note: Ballots and IXC lists received less than 20 days before conversion may not be processed by the conversion date.

APRIL 10, 1998

Allocate undesignated customors with the tentative PIC choice. Third mandated report of customers is mailed to IXCs.

APRIL 20, 1998

Equal Access Conversion at the end office(p).

OCTOBER 20, 1998

End of period when allocated customers can choose a PIC free of charge.

TELEC CONSULTING RESOURCES 3

RECEIVED

909 N. 90th Street, Suite 203 Omaha, NE 68114-2505 (402) 398-0052 FAX (402) 398-0065

301 S. 13th Street, Suite 401 Lincoln, NE 68508 (402) 441-4315 FAX (402) 441-4317

P.O. Box 858, 1509 Sylvan Circle

(605) 582-2020 FAX (605) 582-2021

Brandon, SD 57005-0858

MAY 0 6 1999

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

May 4, 1999

Mr. Bill Bullard, Executive Director South Dakota Public Utilities Commission State Ca, itol Building 500 East Capitol Avenue Pierre, South Dakota 57501

RE: Docket TC99-030/Implementation Plan for IntraLATA Dialing Parity

Dear Mr. Bullard:

On behalf of our client, Jefferson Telephone Company (Jefferson), we are filing an amendment to its intraLATA toll dialing parity implementation plan in the above referenced docket.

The original carrier notification date of May 10 was set before we knew the Public Utilities Commission (Commission) meeting schedule. Since the Commission will not have an opportunity to approve the carrier notification date until the Commission meeting on May 12, we would like to change the date to May 14.

We have enclosed a new time line reflecting this change.

Please give Loretta Calabro or me a call at (402)398-0062 with any questions you may have on this filing.

Thank you.

Sincerely,

Lee Darrington

enc.

cc: Tom Connors, Jefferson Telephone Company

JEFFERSON TELEPHONE COMPANY INTRALATA DIALING PARITY TIMELINE

Carrier notification completed by:	May 14, 1999
Carrier response due by:	June 7, 1999
Customer notification completed by:	June 15, 1999
Customer response due:	July 10, 1999
IntraLATA dialing parity implementation date:	July 15, 1999
End of 60 day grace period:	September 13, 1999

Michel L. Singer Attorney



Room 1575 1875 Lawrence Street Denver, CO 80202 303 298-6527

1 303-248-6301

RECEIVED

MAY 0 7 1999

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

May 6, 1999

Via Overnight Delivery

Mr. Bill Bullard Executive Director SD Public Service Commission 500 East Capital Avenue Pierre, SD 57501

Re: Implementation of Dialing Parity, Docket No. TC99-030

Dear Mr. Bullard:

Enclosed are an original and ten copies of AT&T Communications of the Midwest Inc.'s Comments regarding U S West's South Dakota IntraLATA Dialing Parity Plan. A diskette in Word97 format is also enclosed.

Please feel free to call me if there are any questions.

Sincerely.

Michel Singer Michel L. Singer (93)

Enclosures

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF SOUTH DAKOTA

TC-99-030

In the Matter of the FCC Order)	
Establishing New Deadlines for)	
Implementation of IntraLATA)	
Dialing Parity by Local Exchange	j	
Carriers)	

Sprint's Comments on Implementation lans of U S WEST

Pursuant to the Commission's procedural order in this matter, Sprint Communications Company L.P. (Sprint) submits the following comments on the implementation plan submitted by U S WEST Communications, Inc. (USW) on April 22, 1999.¹

 Sprint objects to USW's proposed practice to automatically extend customers' interLATA PIC freezes to intraLATA at the time that intraLATA dialing parity is implemented. Such a practice is prohibited by the Federal Communications Commission's rules, is not in the customer's best interests, and is anti-competitive. Sprint requests that the Commission disapprove this aspect of USW's implementation plan and order USW to comply with the FCC rules requiring separate customer authorization for interLATA and intraLATA PIC freezes.

 USW's proposed practice regarding PIC freezes is reflected on page 3 of its implementation plan:

<u>Customer</u> "Slamming Protection: Today, customers can ask U S WEST to prevent unauthorized interLATA carrier changes or "slamming" to their accounts by requesting an interLATA PIC freeze. A PIC freeze prevents an interLATA carrier from implementing an account change without the consumer contacting U S WEST directly. Originally, this option was only available at the account level not at the specific jurisdictional level (interLATA or intraLATA).

Effective with the implementation of dialing parity in South Dakota, current customers who have indicated a desire to control their interLATA carrier choices, will also have that control on their intraLATA carrier choice as well. This practice is consistent with U S WEST advocacy in all jurisdictions where toll dialing parity has been implemented.

Sprint has not reviewed the plans submitted by other LECs in this matter and neither acquiesces nor objects to them.

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF SOUTH DAKOTA

)

r

IN THE MATTER OF THE FCC ORDER ESTABLISHING NEW DEADLINES FOR IMPLEMENTATION OF INTRALATA DIALING PARITY BY LOCAL EXCHANGE CARRIERS

DOCKET NO. TC 99-030

AT&T, MCI TELECOMMUNICATIONS' AND MCIWORLDCOM'S COMMENTS REGARDING U S WEST'S SOUTH DAKOTA INTRALATA TOLL DIALING PARITY IMPLEMENTATION PLAN

AT&T Communications of the Midwest, Inc. ("AT&T"), MCI

Telecommunications Corporation and MCIWorldCom, Inc. ("Joint Commentors") submit the following comments regarding U S WEST's proposed IntraLATA Toll Dialing Parity Implementation Plan ("Plan") in accordance with the South Dakota Public Utilities Commission's ("Commission") Order Opening Docket and Setting Procedural Schedule of the issued on March 31, 1999.

I. INTRODUCTION

The Toll Dialing Parity Implementation Plan submitted by U S WEST on April 22, 1999, falls short of providing parity in implementation. To afford South Dakota consumers the maximum competitive opportunity presented by the implementation of dialing parity in the intraLATA toll market, the Joint Commentors request that the Commission order U S WEST to revise its plan to incorporate the changes outlined in these comments.

II. IMPLEMENTATION PLAN

The following areas of U S WEST's Plan require revision if there is to be competitive neutrality during the implementation of intraLATA dialing parity. The Joint Commentors recommend that the Commission move forward with its approval of the Carrier Notice so that U S WEST's implementation date can be met.

A. CUSTOMER NOTIFICATION MUST BE CLEAR AND COMPETITIVELY NEUTRAL

The customer notification letter must be written in a manner that makes it clear to consumers that they are able to choose among intraLATA carriers. At the same time, the letter must be competitively neutral. The proposed notice to customers, presented as Exhibit A to U S WEST's Plan, does not achieve these objectives and must be revised. The sheer number of times that U S WEST's name appears in the customer notification letter precludes the letter from attaining its goal of competitive neutrality. U S WEST's name will be included on the enclosed list of carriers, along with **all** other participating carriers. To mention U S WEST so many times in the short notification focuses an inappropriate degree of attention on the company that, to date, has had the benefit of monopoly-dictated market share.

Additionally, although U S WEST mentions that the customer notification will be sent by means of a one time mailing prior to the scheduled implementation date, the Commission should clarify that the mailings should be a separate letter written on neutral letter head and sent via first class mail, not a bill insert. Allowing the letter to be included with any other information or to be delivered in any other fashion increases the

2

likelihood that customers will perceive the notice to be "junk mail" and discard it without realizing the important choice that is now available.

Finally, the customer notification should be amended to reflect a longer "free" preferred interexchange carrier ("PIC") change period and removal of the PIC freeze extens on language, as discussed below in these comments.

B. CALLS ELIGIBLE/NOT ELIGIBLE FOR INTRALATA PRESUBSCRIPTION MUST BE WELL DEFINED AND PROPERLY LIMITED

U S WEST's list of call types not eligible for intraLATA dialing parity is overly broad, must be more clearly defined and the scope properly narrowed. It appears that U S WEST's plan is to route all calls to U S WEST Directory Assistance, including calls with a 555 prefix, making these calls ineligible for intraLATA presubscription. The proper scope of calls to directory assistance is for those calls that use a 411 or 1+411 dialing pattern to go to local directory assistance. U S WEST claims that calls to 1+NPA/0+NPA toll calls will be eligible for intraLATA presubscription. What is not clear in U S WEST's plan is how it p oposes to handle calls made to 1+NPA+555-1212. In its Iowa intraLATA dialing parity plan, U S WEST stated that such calls were local, and as such, were not eligible for presubscription. The Joint Commentors maintain that calls to 1+NPA+555-1212 are toll calls, not local, and therefore should be routed to the customers' presub-cribed carrier. The Iowa Utilities Board concurred in its Order when it wrote: "It is reasonable to find that customers perceive 1+NPA-555-1212 directory assistance calls to be long distance calls and, therefore, to route these calls to the customer's intraLATA PIC choice."¹ This Commission should require U S WEST to clarify its position regarding 1+NPA-555-1212 calls as to whether or not U S WEST is including those calls among those eligible for presubscription. If U S WEST's position is that those calls should not be eligible for presubscription, the Commission should rule that the calls are eligible for presubscription. Additionally, 0- calls handled by U S WEST operators do not always require U S WEST to handle the call. To allow customers more choices, the Operator instruction must include a script that informs customers of their option to hang up and dial the number directly which would enable the customer to use their pre-selected carrier. Clearly, there are some 0- calls that require Operator assistance. Scripts associated with these calls would need to include direction that customers could dial 00 to reach their presubscribed carrier's operator. To handle 0dialed calls otherwise would not provide customers with adequate information to make a decision on the carrier they want to handle their calls.

C. U S WEST BUSINESS OFFICE PRACTICES MUST BE COMPETITIVELY NEUTRAL

U S WEST, operating as the incumbent LEC providing local service, is the single point of contact for the vast majority of customers when reviewing and deciding on their options for carrier selection. Due to this very significant positioning, U S WEST's business office practices must not advantage U S WEST. There is little information in U S WEST's Plan that provides insight into U S WEST's proposed business office

¹ Iowa Utilities Board, Docket No. SPU-98-10, Order Approving IntraLATA Dialing Parity Implementation Plan in Part and Modifying Plan in Part, Issued February 16, 1999, p. 23, Section IV, § 10.

practices and customer scripts. The information that is presented does not provide competitive neutrality.

For example, the plan states that if new customers are uncertain as to what carrier they wish to select to carry their intraLATA calls, U S WEST will read from a random list and advise the customers that U S WEST is a choice. The Commission should not permit U S WEST to market its intraLATA toll services to customers that it subjectively determines are "uncertain" as to their choice of provider. If allowed, such a scheme will enable U S WEST to leverage its monopoly of the local service market to attain an unfair advantage in competing for intraLATA service customers. More specifically, such a scheme will allow U S WEST to retain its monopoly for intraLATA toll.

U S WEST's attempt to engage in similar unfair practices in Montana and Iowa was appropriately and property forestalled by the Montana Public Service Commission and the Iowa Utilities Board. To reduce the bias inherent in U S WEST's scheme, both states adopted regulations that require U S WEST to offer to read a randomly ordered list of intraLATA provider options, including U S WEST, during calls to establish local service, and prohibit U S WEST from any further marketing of its services during these calls. In its February 16, 1999 Order, the Iowa Utilities Board stated:

It would provide an unfair competitive advantage if U S WEST could request to market its intraLATA services to every new local service customer calling to initiate service. If U S WEST's marketing during the local service initiation call is successful, substantial numbers of new customers will choose U S WEST as their intraLATA PIC before U S WEST's competitors have had any possibility of marketing their services to the new local service customer. This U S WEST practice would be the opposite of competitive neutrality in the intraLATA market.²

5

² Id. p. 14, Section III.D.

Although in its Montana Implementation Plan and in federal court, U S WEST asserts that the Montana regulations violate its free speech rights, this claim is legally unsound. Speech that proposes a commercial transaction, such as U S WEST's, is accorded intermediate constitutional scrutiny³, and therefore, is properly subject to more restriction than speech receiving full constitutional protection.4 To determine what regulation of commercial speech passes constitutional auster, courts engage in the fourpart test put forth in Central Hudson Gas & Elec. Corp. v. Public Service Comm'n, 447 U.S. 557, 566 (1980), which asks whether a regulation seeks to limit misleading information in an area in which the government has a substantial interest, and whether there is a reasonable fit between this goal and the means chosen by the government. Because U S WEST's plan would have mislead Montana consumers, Montana (and South Dakota) has a substantial interest in ensuring choice among intraLATA carriers for its citizens, and regulations that allow fair competition have a "reasonable fit" with the goal of consumer choice, the Montana Commission's regulations are constitutional. The federal court in Montana has not enjoined the enforcement of the regulations. If U S WEST makes such a claim in South Dakota, the Commission should ignore U S WEST's insinuation that the First Amendment hampers its ability to enact reasonable restrictions on U S WEST's presentation of intraLATA service provider options."

The Joint Petitioners request that the Commission direct U S WEST to implement the following competitively neutral approach when interacting with new customers. U S

¹ See, e.g., United States v. Edge Broadcasting Co., 509 U.S. 418, 426 (1993).

⁴ See Valley Broadcasting Co. v. United States, 107 F.3d 1328, 1336 (9th Cir. 1997).

Cf. TurnerBroadcasting System, Inc. v. Federal Communications Comm're, 117 S. Ct. 1174 (1997)

⁽upholding pro-competitive regulations that placed some bandes) on a speaker's commercial speech).

WEST representatives should provide customers their choice of intraLATA carriers, reading to them from a list of providers in the end user's exchange that is randomly scrambled on a daily basis. That list would include U S WEST but would not highlight U S WEST above any other carrier. If the customer asks about U S WEST service, then the initial U S WEST representative would transfer the customer to its marketing/sales representatives who would then inform the customer of service options offered by U S W 2ST.

Similarly, when existing customers contact U S WEST to request a change in intraLATA carrier, steps should be taken to ensure the competitive neutrality of the interaction. Existing customers that request information about U S WEST's toll products and services should be transferred by the initial U S WEST representative to a U S WEST marketing/sales representative.

The Commission should order U S WEST to submit dialing parity business office practices and scripts that are competitively neutral for handling both new and existing customers.

D. THE AUTHORIZATION DATE MUST BE EXPANDED

The plan expl citly limits the Authorization Date, the date the customer initially signs up with a new carrier, to no earlier than 30 days prior to implementation. The 30day window is too restrictive and must be expanded. Customer selections should be allowed to be submitted as soon as possible. The sooner this information can be submitted, the better the conversion can be handled. Better information about the conversion volumes will allow U S WEST to more concisely prepare for a problem-free

7

implementation. The longer period also affords customers the opportunity to get into the queue and allows for quicker conversion of customers to their carrier of choice. The lowa Utilities Board concurred when it ruled:

"It is reasonable to find that intraLATA market competitors should be allowed to market their services and receive customer authorizations at any time. A provision limiting the authorization date for intraLATA changes to no more than 30 days before the implementation date is inconsistent with this finding."⁶

The Joint Petitioners request that the Commission order U S WEST to accept intraLATA PIC changes 60 days prior to implementation. If more than one PIC change is submitted for a customer prior to implementation, the change submitted with the latest date would be implemented and the "free" PIC change would apply to that request.

E. "FREE" CHANGE PERIOD

U S WEST proposes to allow customers one intraLATA carrier change free of charge for only the first 30 days following implementation. In Colorado, Iowa, Oregon, and Utah, U S WEST was ordered to provide a 120-day period for the customers to exercise their free change option. (The Colorado Commission also ordered that customers be able to change their carrier twice during the 120-day period without incurring a charge.) In Washington, <u>U S WEST</u> proposed a 120-day change period; and in Nebraska, the commission ordered a 90-day change period. The consumers of South Dakota should be entitled to no less an amount of time to exercise their choice. In nearly all cases, 30 days would not even allow for a complete bill cycle. Customers should be given sufficient time to analyze their bills and service and to make sure that they are

8

satisfied with their selection. Also, carriers will be analyzing their offers and customer responses to those offers during the first few months after intraLATA toll dialing parity is implemented. It is critical that the time period be sufficiently long enough for companies to fine-tune their offers and for customers to evaluate their competitive choices. Therefore, the Joint Commentors urge the Commission to order U S WEST to offer a 120-day period in which customers can make one PIC change free of charge.

F. DUAL SIMULTANEOUS PIC SELECTION

Although U S WEST does not address the issue in its proposed plan, if a customer selects both an intraLATA and interLATA toll carrier at the same time (after the initial "free" PIC period), only one PIC charge should apply.

G. PIC FREEZES

U S WEST proposes to extend a freeze to any customer's intraLATA toll carrier selection if he or she has previously elected to have his or her interLATA PIC frozen. This extension is expressly prohibited by the new FCC "anti-slamming" rules that were effective on April 27, 1999.⁷ In its Second Report and Order, the FCC stated:

We also conclude that preferred carrier freeze procedures, including any solicitation, must clearly distinguish among telecommunications services subject to a freeze, i.e., between local, intraLATA toll, interLATA toll, and international toll services....We thus conclude that 'account level' freezes are unacceptable and that, instead, carriers must explain clearly the

^{*} Iowa Utilities Board, Docket No. SPU-98-10, Order Approving IntraLATA Dialing Parity Implementation Plan in Part and Modifying Plan in Part, Issued February 16, 1999, p. 23, Section IV, ¶ 13.
⁷ In the Matter of Implementation of the Subscriber Carrier Selection Changes Provisions of the Telecommunications Act of 1996, Policies and Rules Concerning Una thorized Changes of Consumers' Long Distances Carriers, FCC 98-334, CC Docket No. 94-129, (Released Dec. 23, 1998.)

difference in service and obtain separate **authorization** for each service for which a preferred carrier freeze is requested.¹ (emphasis added)

The applicable FCC rule states:

Preferred carrier freeze procedures, including any solicitation, must clearly distinguish among telecommunications services (e.g., local exchange, intraLATA/intrastate toll, interLATA/interstate toll, and international toll) subject to a preferred carrier freeze. The carrier offering the freeze must obtain separate authorization for each service for which a preferred carrier freeze is requested.⁹

Despite this clear language from the FCC, U S WEST proposes that this Commission permit it to automatically extend customer-initiated interLATA carrier freezes to the intraLATA portion of the account at "implementation of dialing parity." Despite the fact that U S WEST's proposal, on its face, violates the new federal rules, it is important to read between the lines to understand the full impact of U S WEST's proposal. U S WEST, by virtue of its monopoly-mandated position as the incumbent intraLATA toll carrier, would then be the "frozen" carrier for intraLATA calls for any customer that had previously chosen, and then frozen, an interLATA carrier. It is ludicrous that U S WEST labels this portion of its plan as "Customer 'Slamming' Protection," when it is U S WEST that, by this action, proposes to implement choices that have not been authorized by the customers. In its plan, U S WEST states that this practice is consistent with U S WEST advocacy in all jurisdictions where toll dialing parity has been implemented. This statement is true although it has nothing to do with protecting customers as U S WEST would like this Commission to believe. Rather, it has everything to do with preserving U S WEST's market share and making the process of

1d., §123

* FCC Part 64, Subpart K, 64.1190(c)

changing carriers as drawn-out and frustrating as possible for customers in hopes of delaying or possibly totally forestalling the customers' ability to enjoy competitive a' ernatives to U S WEST.10 Even if this practice had not been ruled illegal by the FCC. U S WEST neglects to inform this Commission that the very reason several other state commissions originally permitted this practice was that U S WEST had said it was technically incapable of implementing jurisdictional-specific freezes on customers accounts. U S WEST's claim left those commissions with choosing between either ordering U S WEST to remove interLATA freezes that customers had requested or extending the freeze to the whole account. Those commissions, choosing between the lesser of two evils, permitted U S WEST to freeze itself as the intraLATA carrier for those customers without the customer's authorization. Although U S WEST now admits that it has the capability to implement jurisdictional PIC freezes, it continues to request that this Commission permit it to continue this illegal, self-serving practice. In March 1999, MCIWorldCom filed a complaint in Colorado against U S WEST for this practice, known as "jamming" in the industry. In April 1999, AT&T filed similar complaints against U S WEST in Colorado and Oregon. Also, AT&T and Sprint Communications recently filed petitions in the nine additional states where U S WEST currently offers intraLATA dialing parity requesting that those commissions, consistent with the new federal rules, order U S WEST to remove any freezes on customers' accounts that the customers did not authorize.

¹⁰ U S WEST projected a 22-40% loss of its \$60 million intraLATA toll revenue the first year following implementation in Iowa. Direct Testimony of Max A. Phillips, Iowa Utilities Board, In Re: U S WEST Communications, Inc., Docket No. SPU-98-10, November 13, 1998, p. 8, Ins. 12-15.

Accordingly, this Commission should deny U S WEST's request for account level freezes and order the removal of the "freeze" paragraph from the proposed customer notification letter.

H. COST RECOVERY INFORMATION IS INCOMPLETE

U S WEST mentions that it is compiling the necessary information and will be submitting an application for cost recovery with the Commission. Although U S WEST is entitled to recoup any incremental costs associated with implementing intraLATA dialing parity, the Joint Commentors request that they be permitted to review and comment on any proposed recovery costs and cost studies. Although U S WEST has not submitted its complete cost recovery proposal yet, there are two items that bear review at this time:

 U S WEST proposes a one-time bulk billing of each participating carrier to recover the waived charges associated with the changes done during the grace period. Recovery of this cost, as with all other appropriate incremental costs associated with implementation of intraLATA toll dialing parity in South Dakota, should be done via the EANRC element.

When U S WEST recently proposed a similar up-front recovery charge in Iowa, the Iowa Utilities Board ruled:

The Board finds that the more procompetitive approach to this issue is to allow recovery through the EANRC. While the burden of immediate payment of a bulk bill for the waived charges may not be great, it is nonetheless a burden on new entrants that may discourage participation in the market, U S WEST will receive its change charges plus a return over the three-year EANRC recovery period. 2. U S WES." proposes a three-year cost recovery period. The recovery period granted in other states in U S WEST's territory has ranged from three to five years. The Joint Commentors suggest that the Commission order that the cost recovery be spread over a <u>minimum</u> three year period and up to five years, with a review and any appropriate adjustments to be done halfway through this period. Additionally, the Commission should order that the EANRC element be removed from U S WEST's tariff upon complete recovery of approved costs.

I. CLASSIFICATION OF TOLL SERVICES

U S WEST requests that upon approval of its dialing parity plan, that the Commission reclassify its intraLATA toll service from emerging competitive to fully competitive. Mere introduction of intraLATA dialing parity does not mean that full competition is in place. Rather, it is the beginning of true competition in this market. The Joint Petitioners therefore request that the Commission deny U S WEST's request for reclassification or at most order that a separate docket be opened for this proceeding.

III. CONCLUSION

The changes and clarifications proposed by the Joint Commentors are easily implemented and should not preclude U S WEST from making intraLATA dialing parity available in its South Dakota territory in a timely manner. Much of the work toward implementation is unaffected and should continue unabated. Review of conversion costs and establishment of an initial EANRC can occur at any time up to and even after implementation occurs and will be highly dependent on when the data are available from U S WEST. Accordingly, the Joint Commentors recommend that U S WEST's South Dakota IntraLATA Toll Dialing Parity Implementation "lan be modified as set forth above.

DATED this 6th day of May, 1999.

AT&T COMMUNICATIONS OF THE MIDWEST, INC.

Maria Arias Chapleau Michel Singer 1875 Lawrence Street, Suite 1575 Denver, CO 80202 (303) 298-6527

ATTORNEYS FOR AT&T COMMUNICATIONS OF THE MIDWEST, INC.

Philip E. Stoffregen Dickinson, Mackaman, Tyler & Hagen, P.C. 1600 Hub Tower 699 Walnut Street Des Moines, IA 50309-3986 Telephone: (515) 246-4539 Karen Clauson Regulatory and Governmental Affairs MCI Telecommunications Corporation 707 17th Street, Suite 3900 Denver, CO80202 Telephone: (303) 390-6655

ATTORNEYS FOR MCI TELECOMMUNICATIONS CORPORATION AND MCI WORLDCOM, INC.

CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of May, 1999, the original and 10 copies of AT&T Communications of the Midwest, Inc., MCI Telecommunication Corp., and MCI WorldCom's Comments regarding U S West's South Dakota IntraLATA Dialing Parity Plan were delivered via overnight delivery to:

William Bullard, Jr Executive Director South Dakota Public Utilities Commission 500 East Capitol Avenue Pierre, SD 57501

and a true and correct copy was delivered by U S mail on this 6th day of May, 1999 to:

Todd Lundy Senior Attorney U S WEST COMMUNICATIONS, INC. 1801 California Street, Suite 5100 Denver, CO 80202

Jaret Jeno



Donald Low

State Regulatory Minirs/Mountain Region 8140 Ward Parkway Karsas Gir, MO 94114 Ware 913 624 6865 Fax 913 624 6865 Fax 913 624 5681 don a lowfe meal spent core

RECEIVED

May 6, 1999

MAY 07 1999 SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

VIA FEDERAL EXPRESS

Mr. William Bullard, Jr. Executive Director South Dakota Public Utilities Commission 500 E. Capitol Avenue, State Capitol Pierre, SD 57501

> Re: In the Matter of the FCC Order Establishing New Deadlines for Implementation of IntraLATA Dialing Parity by Local Exchange Carriers Docket No. TC-99-030

Dear Mr. Bullard:

Enclosed for filing, are the original and ten copies of Sprint's Comments on Implementation Plans of U S WEST. Please return one file-stamped copy in the enclosed envelope.

Thank you for your assistance. Please call me if you have any questions.

Very truly yours,

Donald A. Low

DAL:kmm Enclosures Thereafter, the protection will be controlled at the jurisdictional level instead of the account level. Customers will have the ability to protect either their interLATA or intraLATA carrier choices, or both. Any carrier change to a protected customer's account will take direct action by the customer. The customer notification regarding intraLATA calling alternatives will include a description of how to make changes to a protected account.

(Emphasis supplied.)

3. USW's proposal to automatically extend customers' interLATA PIC freezes to their intraLATA carrier choice at the time of intraLATA dialing parity implementation is blatantly contrary to the FCC's rules adopted in December.² The rules addressing preferred carrier freezes, found at 47 C.F.R. §64.1190, require that local exchange carriers offering preferred carriers freezes must comply with certain procedures:

(c) Preferred carrier freeze procedures . . . must clearly distinguish among telecommunications services (e.g. local exchange, intraLATA/intrastate toll, interLATA/ interstate toll, and international toll) subject to a preferred carrier freeze. The carrier offering the freeze must obtain separate authorization for each service for which a preferred carrier freeze is requested.³

...

(d) Solicitation and imposition of preferred carrier freezes.

...

In the Matter of Implementation of the Subscriber Carrier Selection Changes Provision of the Telecommunications Act of 1996, Policies and Rules Concerning Unauthorized Changes of Consumers' Long Distance Carriers, FCC 98-334, CC Docket No. 94-129 (Dec. 23, 1998) (hereinafter "FCC Order.")

In adopting this rule, the FCC noted in its Order, at paragraph 123:

We also conclude that preferred carrier freeze procedures, including any solicitation, must clearly distinguish among telecommunications services subject to a freeze, i.e., between local, intraLATA toll, interLATA toll, and international toll services. This rule will address concerns raised by commenters, including MCI and NAAG, that consumers may experience confusion about the differences between telecommunications services when employing freezes. It will also serve to prevent unscrupulous carriers from placing freezes on all of a subscriber's services when the subscriber only intended to authorize a freeze for a particular service or services. We thus conclude that "account level" freezes are unacceptable and that, instead, carriers must explain clearly the difference in services and obtain separate authorization for each service for which a preferred carrier freeze is requested. We note that a broad range of commenters, including many incumbent LECs, agree that customers should have the ability to place individual freezes on their interLATA, intraLATA toll, and local services. While some members of the public may still be unclear about the distinctions between different telecommunications services, particularly the difference between intraLATA toll and interLATA toll services, we expect that carriers can help, customers to develop a better understanding of these services.

(2) No local exchange carrier shall implement a preferred carrier freeze unless the subscriber's request to impose a freeze has first been confirmed in accordance with one of the following procedures [that are the same as those required for confirmation of a change in preferred carriers].

In automatically extending any interLATA PIC freezes to intraLATA toll service, USW is implementing freezes to the intraLATA service without obtaining confirmed customer authorizations for freezing that separate service. This is so even though USW appears to generally recognize its obligation to implement PIC freezes separately for each service (at the "jurisdictional level") and not at the "account level." USW is, however, only complying with the FCC requirements with regard to freezes that are put in place <u>after</u> implementation of intraLATA toll dialing parity. USW is inexplicably ignoring the FCC requirements with regard to <u>existing</u> interLATA PIC freezes by applying them to intraLATA service.

4. In automatically extending customer's interLATA PIC freezes to intraLATA toll, USW is also not acting in its customers' interests. Obviously, the customers' current interLATA PIC freezes were implemented when intraLATA dialing parity was not a customer option. USW has no way of knowing whether a customer wishes to extend the interLATA PIC freeze to intraLATA services when the customer has never before had a choice of 1+ carriers for intraLATA toll service. USW's proposal thus is likely to be directly contrary to at least some of its customers' desires. Furthermore, automatic extension of a c stomer's interLATA PIC freeze inhibits the customer's ability to switch intraLATA carriers. Customers who will want to change intraLATA carriers when 1+ is implemented will be faced with the extra steps and inconvenience of "unfreezing" their intraLATA accounts if USW's proposal is accepted. Rather than imposing such unwarranted inconvenience on its customers, USW should comply with the FCC

requirements and only implement PIC freezes when it has separate interLATA and intraLATA customer authorization.⁴

5. USW's purpose in automatically extending an interLATA PIC freeze to intraLATA toll services is obviously to unfairly slow or reduce its losses in the impending intraLATA 1+ marketplace. Until now, USW customers have had no other choices available for intraLATA 1+ service providers. Automatically extending the interLATA PIC freeze to intraLATA would lock USW in as those customers' provider. USW's proposal is thus an anti-competitive attempt to deprive those customers of their free choice of carriers at the very time that that opportunity is first available. USW's proposal would defeat the purpose of the Telecommunications Act's mandate for introduction of competition into the intraLATA market and should not be permitted.

6. Sprint notes that USW's implementation plan references the Commission's prior decision regarding classification of USW's intraLATA toll services and suggests that those services should be classified as fully competitive upon dialing parity implementation. Sprint assumes that USW will file a separate formal application for such classification and that interested parties will have a full opportunity to provide information and arguments as to the appropriateness of such a classification. However, Sprint would suggest that USW's proposal to automatically extend current interLATA PIC freezes to intraLATA services adversely affects the competitiveness of the intraLATA toll market. If USW's proposal is not rejected, its intraLATA services cannot be considered as fully competitive. Furthermore, Sprint suggests that other USW actions with regard to PIC freezes could also affect the competitiveness of the intraLATA market. For example, although USW is now free to solicit separate intraLATA PIC freezes from its customers; any efforts to do so without fully informing the customers of the pending implementation of intraLATA 1+ would be misleading to customers and have detrimental effects

⁴

USW's proposed notice to customers should be changed accordingly.

on the competitiveness of that market. Of course, USW can also adversely affect competition in the intraLATA market by not fully complying with the FCC's disclosure and verification requirements regarding solicitation and implementation of PIC freezes. Based on its proposal in this case, there is every reason to suspect that USW may engage in these or other anticompetitive activities. The Commission should therefore be very careful before classifying USW's intraLATA toll as fully competitive.

7. Lastly, Sprint would suggest the need for clarification concerning USW's PIC change charge. USW is proposing a \$5 charge for changes in the intraLATA PIC, which is the same as the existing charge for interLATA PIC changes. Sprint does not object to that charge *per se* but believes that only one \$5 charge should apply if a customer changes both the interLATA and intraLATA PIC at the same time. Such an charging structure has been ordered or approved by numerous other state commissions to reflect the fact that little, if any, additional costs are incurring when both PIC's are changed simultaneously.

Dated: May 6, 1999

Respectfully submitted,

Sprint Communications Company L.P.

Donald A. Low Sprint 8140 Ward Parkway - 5E Kansas City, MO 64114 (913) 624-6865 FAX 624-5681

Richard Tieszen Thomas Harmon Tieszen Law Office PO Box 626 Pierre, SD 57501-062 5 (605) 224-1500 FAX 224-1600

Certificate of Service

The undersigned hereby certifies that the foregoing was served by mailing a copy, postage prepaid, on this 6th day of May, 1999, to Todd Lundy, Senior Attorney, U S WEST, Inc., 1801 California, Suite 5100, Denver CO 80202.

ad not



Capitol Office

Transportation/ Warehouse Division Telephone (605)773-5280

FAX (645)773-3225

Consumer Hotline

1-800-332-1782 TTY Through

Relay South Dakota 1-800-877-1113

Interne: Website ww.poc.state.ad.an/pac/

Telephone (605)773-3201 FAX (605)773-3209





5 ate Capitol Building, 500 East Capitol Avenue, Pierre, South Dakota 57501-5070

May 7, 1999

Mr. Bill Bullard SD Public Utilities Commission 500 East Capital Avenue Pierre, SD 57501

RE: Comments on Dockets TC99-030, TC99-041, TC99-042, TC99-043, TC99-046, and TC99-047

Dear Mr. Bullard:

Enclosed are an original and 10 copies of Staff's Comments on IntraLATA Toll Dialing Parity Plans regarding the above-referenced dockets. Please file these in the appropriate dockets.

Sincerely,

Karn E. Cremer

Karen E. Cremer Staff Attorney

TUNM Karen E. C

William Bullard Jr. Executive Director

Hurlan Best Martin C. Bettmar Sur Cichos Karen E. Cremer Michele M. Farris Marlette Fischbach Shirleen Fugitt Lewis Hammond Loni Healy Camron Hoseck Lisa Hulf Dave Jacobson Katie Johnson Bob Knadle Delaine Kolbo Jeffrey P. Lorensen Charlene Lund Terry Norum Gregory A. Rislov Keith Seager Rolayne Ailts Wjest

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF SOUTH DAKOTA

1

۱.

IN THE MATTER OF THE FCC ORDER ESTABLISHING NEW DEADLINES FOR IMPLEMENTATION OF INTRALATA DIALING PARITY BY LOCAL EXCHANGE CARRIERS

5

STAFF COMMENTS ON INTRALATA TOLL DIALING PARITY PLANS TC99-030; TC99-041; TC99-042; TC99-043; TC99-046; TC99-047

On March 23, 1999, the Federal Communications Commission (FCC) issued an order establishing new deadlines for implementation of intraLATA dialing parity by local exchange carriers (LECs). In the Matters of Implementation of the Local Competition Provisions of the Telecommunications Act of 1996; Petition of Southwestern Bell Telephone Company, Pacific Bell, and Nevada Bell for Expedited Declaratory Ruling on Interstate IntraLATA Toll Dialing Parity or, in the Alternative, Various Other Relief, CC Docket No. 96-98, FCC 99-54 (released March 23, 1999). The order states that "[n]o later than April 22, 1999, all LECs must file intraLATA toll dialing parity plans with the state regulatory commission for each state in which the LEC provides telephone exchange service if a plan has not yet been filed with such state commission. Once a state commission has approved a plan, the LEC must implement its plan no later than 30 days after the date on which the plan is approved." Id. at ¶7. If the state commission has not acted on the plan by June 22, 1999, the LEC must file the plan with the Common Carrier Bureau of the FCC. Id.

At its March 30, 1999, meeting, the Public Utilities Commission (Commission) opened a docket in order to review intraLATA toll dialing plans and established a procedural schedule that would allow other parties to file written comment on the LECs' intraLATA toll dialing plans. No parties objected to this proposal. At its April 1, 1999, meeting, the Commission issued guidelines for LECs to follow when developing their intraLATA toll dialing plans. On the issue of cost recovery, the Commission decided that if a LEC believes that it needs cost recovery, the LEC should file for cost recovery in a separate proceeding before the Commission in accordance with FCC rules.

On April 23, 1999, the Commission faxed notice that the following companies had filed intraLATA toll dialing parity plans: Heartland Telecommunications Company of Iowa on April 20, 1999; Accent Communications, Inc. on April 20, 1999; Splitrock Properties, Inc. on April 21, 1999; Jefferson Telephone Company on April 21, 1999; Venture Communications, Inc. on April 21, 1999; Hanson County Telephone Company on April 21, 1999; Vivian Telephone Company d/b/a Golden West Communications, Inc. on April 21, 1999; Stockholm Strandburg Telephone Co. on April 22, 1999; AT&T Communications of the Midwest, Inc. on April 22, 1999; Midco Communications on April 22, 1999; Heartland Communications, Inc. on April 22, 1999; Mobridge Telecommunications on April 22, 1999; West River Telecommunications Cooperative on April 22, 1999; Dakota Telecommunications Group, Inc., DTG Communications, Inc. on April 22, 1999; and U S WEST Communications, Inc. on April 22, 1999.

The following local exchange carriers notified the Commission that they have completed conversion to intraLATA dialing parity. Fort Randall Telephone Company on April 21,1999; Mt. Rushmore Telephone Company on April 21, 1999; CommChoice, LLC on April 22, 1999; and Kadoka on April 26, 1999.

Dickey Rural Telephone Cooperative, Dickey Rural Communications, Inc. Consolidated Telephone Cooperative and Consolidated Telcom, Inc. formerly known as CTC Communications, Inc. petitioned the Commission for a suspension and modification of the requirement for implementation of intraLATA dialing parity in its service areas until June 30, 2000.

Kennebec Telephone Company filed its intraLATA toll dialing parity implementation plan and, pursuant to ARSD 20:10:32:39 and 47 U.S.C. 251(f)(2), a petitioned for suspension and modification of the requirement for implementing intraLATA dialing parity until September 19, 19:9.

Western Telephone Company filed its intraLATA toll dialing parity implementation plan and, pursuant to ARSD 20:10:32:39 and 47 U.S.C. 251(f)(2), a petition for suspension and modification of the requirement for implementing intraLATA dialing parity until September 15, 1999.

Beresford Municipal Telephone Company filed its intraLATA toll dialing parity implementation plan and, pursuant to ARSD 20:10:32:39 and 47 U.S.C. 251(f)(2), a petition for suspension and modification of the requirement for implementing intraLATA dialing parity until September 15, 1999.

COMMISSION STAFF'S RECOMMENDATION

Commission Staff has reviewed the toll diring parity plans filed by the aforementioned companies utilizing the guidelines as ϵ stablished by the Commission in its April 1, 1999, order. Staff then categorized the companies and will make its recommendations using these categories.

SDN COMPANIES

Heartland Communications Inc., Accent Communications, Inc., Splitrock Properties, Inc., Venture Communications, Inc., Hanson County Telephone Company, Hanson Communications, Inc. d/b/a McCook Telecom, Stockholm Strandburg Telephone Co., Mobridge Telecommunications, Stateline Telecommunications, Inc., Vivian Telephone Company d/b/a Golden West Communications, Inc. all requested Commission approval to send out its carrier notification letters in advance of final Commission action on the proposed plan with the carrier notifications comple¹ d by June 1, 1999. Staff would recommend that the Commission grant the companies approval to send out its carrier notification letter (Appendix A and B) in advance of final Commission action on the proposed plan. Staff would further recommend that the language in the customer notification letter (Appendix C) be amended to state that the customer, if they choose to change their intraLATA long distance carrier, directly contact the long distance company that they have chosen in order to initiate that change with the LEC. This will not only allow the customer to pick a plan that best suits their needs but it will ensure that a LOA is processed or that third-party verification will occur.

Staff would also recommend that Accent Communications, Inc.'s letter to its customers (Appendix C) include a statement that after the 60 day grace period has expired, that there will be a charge to change carriers and the letter should state the amount of the charge.

Heartland Communications, Inc. did not file a customer letter (Appendix C) that was company specific. Staff would recommend that the company file such a letter before final approval of the plan.

Jefferson Telephone Company has filed an amendment to its plan asking that its carrier notification letter be approved no later than May 14, 1999. Staff would recommend approval of this amendment.

Staff would note that none of the aforementioned companies addressed the issue of pay phones in their plans and Staff would recommend that they amend their filing to address this issue.

END OFFICE

Dakota Telecommunications Group, Inc., DTG Community Telephone, Inc. and Dakota Telecom, Inc. and West River Telecommunications Cooperative requested Commission approval to send out its carrier notification letters in advance of final Commission action on the proposed plan. Staff would recommend that the Commission grant the companies approval to send out its carrier notification letter (Appendix A for both companies and also Appendix B for West River) in advance of final Commission action on the proposed plan. Staff would further recommend that the language in the customer notification letter be amended to state that the customer, if they choose to change their intraLATA long distance carrier, directly contact the long distance company that they have chosen in order to initiate that change with the LEC. This will not only allow the customer to pick a plan that best suits their needs but it will ensure that a LOA is processed or that third-party verification will occur.

Staff would note that neither of the aforementioned companies addressed the issue of pay phones in their plans and Staff would recommend that they amend their filing to address this issue.

U S WEST

U S WEST Communications, Inc. requested Commission approval to send out its carrier notification letters in advance of final Commission action on the proposed plan. Staff would recommend that the Commission grant the company approval to send out its carrier notification letter in advance of final Commission action on the proposed plan. U S WEST has stated in its filing that it will file a waiver with the FCC requesting an extension of time to implement toll dialing parity in the McIntosh, Timber Lake and Morristown exchanges. According to the Commission's order setting forth the guidelines to be followed, U S WEST is to describe how it will offer dialing parity for each exchange and its proposed time schedule. U S WEST has not listed its exchanges nor has its asked this Commission for a waiver to extend the time to implement toll dialing parity in the McIntosh, Timber Lake, and Morristown exchanges. Staff recommends that U S WEST list the exchanges individually with the NXX provided so that carriers know which exchanges are included and that U S WEST's toll dialing parity plan be applied to all its exchanges within the state.

In U S WEST's customer notification letter (Exhibit A), U S WEST requires the customer to contact U S WEST to remove the "pic freeze" prior to selecting an intraLATA carrier if it is a carrier other than U S WEST. Since this is the first time a customer can select an intraLATA carrier there should be no "freeze" associated with intraLATA long distance. Staff would recommend that U S WEST be required to remove this paragraph from the customer letter.

When taking orders from new or existing customers U S WEST proposes to respond to a customer's request for further information as to U S WEST's toll products and services at that time. Staff would recommend that should a customer request further information as to U S WEST's toll products and services that the customer be transferred to U S WEST's marketing/sales representatives.

US WEST's plan allows customers to change their intraLATA carrier one time free of charge during the first 30 days following implementation. Staff would recommend that the grace period be a minimum of 60 days. This would allow the customer to receive at least one bill from the intraLATA carrier.

U S WEST is requesting that MTS be classified as fully competitive effective July 22, 1999. Staff would recommend denial of this request. Such a request should be considered in a separate docket.

AT&T

Staff would recommend that AT&T make a full disclosure to new and existing customers that if they do not indicate a preference for an alternate carrier, that the customer's traffic will by default go to AT&T. Staff would also recommend that AT&T remove from the customer letter (Exhibit 1) the requirement that the customer who wishes to change carriers, that they contact AT&T's business office first.

Staff would recommend that the language in the customer notification letter (Exhibit 1) be amended to state that the customer, if they choose to change their intraLATA long distance carrier, directly contact the long distance company that they have chosen in order to initiate that change with the LEC. The letter should include a list of long distance providers to choose from and their toll free numbers so that the customer can contact the long distance companies. This will not only allow the customer to pick a plan that best suits their needs but it will ensure that a LOA is processed or that third-party verification will occur

Staff would note that AT&T did not address the issue of pay phones in its plan and Staff would recommend that it amend its filing to address this issue.

MIDCO

Staff would recommend that the customer notification letter (Exhibit A) be rewritten to be "more customer friendly" and less technical. The letter should have the customer directly contact the long distance company and should include a list of long distance providers to choose from and their toll free numbers so that the customer can contact the long distance companies and decide which rate plan best suits their needs. This will ensure that a LOA is processed or that third-party verification will occur. Also Midco should be definitive as to whether or not there will be a PIC charge.

Staff would note that Midco did not address the issue of pay phones in its plan and Staff would recommend that it amend its filing to address this issue.

FOREIGN

Heartland Telecommunications Company of Iowa filed its plan without including its exchanges and NXX numbers, carrier notification letter, and customer notification letter. Staff would recommend that these documents be filed before final approval of the plan.

Staff would note that Heartland did not address the issue of pay phones in its plan and Staff would recommend that it amend its filing to address this issue.

SUSPENSION AND MODIFICATION

Dickey Rural Telephone Cooperative, Dickey Rural Communications, Inc., Consolidated Telephone Cooperative and Consolidated Telcom, Inc. formerly known as CTC Communications, Inc., Kennebec Telephone Company, Western Telephone Company, and Beresford Municipal Telephone Company all filed their toll dialing parity plans requesting suspension and modification of its plan.

Dickey Rural Telephone Cooperative, Dickey Rural Communications, Inc., Consolidated Telephone Cooperative and Consolidated Telcom, Inc. formerly known as CTC Communications, Inc. state that suspension and modification are necessary to avoid imposing requirements that are unduly economically burdensome and infeasible, and that suspension and modification are consistent with the public interest, convenience and necessity. Staff would recommend denial of suspension and modification as Dickey Rural Telephone Cooperative, Dickey Rural Communications, Inc., Consolidated Telephone Cooperative and Consolidated Telcom, Inc. formerly known as CTC Communications, Inc. did not prove in its filing that providing intraLATA toll dialing parity requires suspension and modification and require the companies to file intraLATA toll dialing parity plans consistent with the Commission's prior orders.

Kennebec Telephone Company began implementing intraLATA dialing parity in conjunction with its implementation of interLATA dialing parity the day before the FCC issued its order ordering LEC's to implement intraLATA toll dialing parity. Kennebec states in its petition that to alter the plan already in process would be unduly economically burdensome, technically infeasible, and inconsistent with public interest. Staff would recommend that granting approval of Kennebec's petition for suspension and modification until September 19, 1999.

Western Telephone Company and Beresford Municipal Telephone Company filed their intraLATA toll dialing parity plans requesting suspension and modification due to ongoing negotiations and no decisions being reached regarding whether or not intraLATA dialing parity will be provided by SDN as centralized equal access or if it will be provided from its end offices. Staff would recommend granting approval of Western's petition for suspension and modification until September 15, 1999. Staff would further recommend that the language in the customer notification letter (Appendix C) be amended to state that the customer, if they choose to change their intraLATA long distance carrier, directly contact the long distance company that they have chosen in order to initiate that change with the LEC. This will not only allow the customer to pick a plan that best suits their needs but it will ensure that a LOA is processed or that third-party verification will occur.

Staff would note that none of the aforementioned companies, with the exception of Kennebec, addressed the issue of pay phones in their plans and Staff would recommend that they amend their filing to address this issue.

MISCELLANEOUS

Valley Cable & Satellite Communications, Inc. sent a copy of a customer letter to the Commission on March 26, 1999. Sancom, Inc. sent the Commission a copy of its carrier letter on April 1, 1999. Staff would recommend that the companies file a letter with the Commission confirming that they offer intraLATA toll dialing parity and the date of such offering.

NON-RESPONDENTS

Staff would note that the following LECs did not file any p'ans with the Commission:

- Farmers Mutual Telephone Cooperative, Ellendale, ND
- GTE of Minnesota, Minneapolis, MN
- Great Plains Communications, Blair, NE
- RT Communications, Inc., Worland WY
- Red River Telecom, Inc., Abercrombie, ND
- Three River Teleco, Lynch, NE

- 7 U S WEST Communications of Iowa
- U S WEST Communications of Nebraska
- U S WEST Communications of Minnesota
- 10. Valley Telephone Company, Browns Valley, MN
- 11 NebCom, Inc. Jackson, NE
- 12 Baltic Telecom Cooperative, Baltic, SD
- 13. Brookings Municipal Utilities, Brookings, SD
- 14. Interstate Telephone Cooperative, Clear Lake, SD
- 15. James Valley Cooperative Telephone, Groton, SD
- 16. McCook Cooperative Telephone Company, Salem, SD
- 17 Midstate Telephone Company, Kimball, SD
- 18. Sanborn Telephone Cooperative, Woonsocket, SD
- 19. Sioux Valley Telephone Company, Dell Rapids, SD
- 20. Splitrock Telecom Cooperative, Inc., Garretson, SD
- Sully Buttes Telephone Cooperative, Highmore, SD
- 22. Tri-County Mutual Telephone Company, Emery, SD
- 23. Valley Telecommunications Cooperative, Herreid, SD
- 24. Golden West Telecommunications Cooperative, Inc., Wall, SD
- 25. West River Cooperative Telephone Company, Bison, SD
- 26. Cheyenne River Sioux Tribe Telephone Authority, Eagle Butte, SD
- 27. Atlas Communications, Ltd., Denver, CO
- 28. Black Hills FiberCom, LLC, Rapid City, SD
- 29. Crystal Communications, Inc., Mankato, MN
- 30. Dakota Telecommunications, Inc., Irene, SD
- 31. Easton Telecom Services, Inc., Richfield, OH
- 32. Eclipse Communications Corporation, Issaquah, WA
- 33. Excel Telecommunications, Inc., Dallas, TX
- 34. F.D.S.D. Rapid City, Inc., Rapid City, SD
- 35. FiberComm, L.C., LeMars, IA
- 36. FirsTel, Inc., Sioux Falls, SD
- 37. GLD, Group Long Distance, Inc., Fort Lauderdale, FL
- LCI International Telecom Corporation, McLean, VA
- LDM Systems, Inc., New City, NY
- MCImetro Access Transmission Services, Inc., Vienna, VA
- 41. McLeodUSA Telecommunications Services, Inc., Cedar Rapids, IA
- 42. Northern Valley Communications, L.L.C., Bath, SD
- 43. PAM Oil Inc. d/b/a PAM Communications, Sioux Falls, SD
- 44. Quintelco, Inc., Pearl River, NY
- 45. Sioux Falls Cable Television, Sioux Falls, SD
- Sprint Communications Company L.P., Kansas City. MO
- Sterling International Funding, Inc. d/b/a Reconex, Hubbard, OR
- 48. Telco Holdings, Inc. d/b/a Dial & Save, Chantilly, VA
- 49 Tel-Save, Inc. d/b/a The Phone Company, Inc., New Hope, PA
- 50. WorldCom Technologies, Jackson, MS
- 51. Bridgewater-Canistota Independent Telephone Company, Hartford, SD
- 52. RC Communications, Inc., New Effington, SD
- 53. East Plains Telecom, Inc., Baltic, SD

- 54. Roberts County Telephone Cooperative Association, New Effington, SD
- 55. Union Telephone Company, Hartford, SD
- 56. Armour Independent Telephone Company, Armour, SD
- 57. ('aith Municipal Telephone, Faith, SD

Staff would recommend that these companies file a letter with the Commission stating the date that it began offering intraLATA toll dialing parity in South Dakota.

Dated this 7th day of May, 1999.

arm E. Cremer

Karen E. Cremer Staff Attorney South Dakota Public Utilities Commission 500 East Capitol Pierre, SD 57501 Telephone (605) 773-3201

BEFORE THE PUBLIC UTILITIES COMMISSION MAY 1 0 1999 OF THE STATE OF SOUTH DAKOTA

)

۱

IN THE MATTER OF THE FCC ORDER ESTABLISHING NEW DEADLINES FOR IMPLEMENTATION OF INTRALATA DIALING PARITY BY LOCAL EXCHANGE CARRIERS

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION TC 99-030

RECEIVED

U S WEST's COMMENTS ON AT&T'S DIALING PARITY IMPLEMENTATION PLAN

FAX Received MAY 07 1999

U S WEST Communications, Inc. (U S WEST), through counsel, submits its comments in response to AT&T's request for approval of its dialing parity implementation plan.

U S WEST submits these comments for two reasons. First, certain provisions of AT&T's Plan are inconsistent with the FCC's rules on dialing parity. Second, AT&T's proposed notice to customers represents a substantial departure from notices to be provided by other local exchange carriers. U S WEST suggests that AT&T's notice should be consistent with the notices of other carriers

AT&T's local exchange services and exchanges

As a threshold matter, AT&T's plan raises questions regarding the nature of its local exchange service. U S WEST suggests that a description from AT&T of its local exchange service would assist the commission as well as interested parties. For example, general information on how AT&T offers its local service and its technology would be helpful. Further, U S WEST requests AT&T to identify the exchanges in which it will implement dialing parity.

New customer practices

AT&T's Plan says that, "[i]f the new customer does not indicate a preference for an alternate carrier, interLATA and intraLATA toll traffic sent over AT&T Digital Link nodal facilities will be carried over AT&T's network as part of the subscribers' new nodal agreement."

AT&T's treatment of new customers who do not make a selection of their preferred intraLATA carrier conflicts with the FCC's Rules on dialing parity. The Rules say:

A LEC may not assign automatically a customer's intraLATA toll traffic to itself, to its subsidiaries or affiliates, to the customer's presubscribed interLATA or interstate toll carrier, or to any other carrier, except when, in a state that already has implemented intrastate, intraLATA toll dialing parity, the subscriber has selected the same presubscribed carrier for both intraLATA and interLATA toll calls.

47 C.F.R. Section 51.209(c). AT&T's Plan automatically assigns new customers to AT&T's intraLATA service, and therefore is incompatible with Rule 51.209(c).

Notice to subscribers

AT&T's Notice to its subscribers of the availability of intraLATA toll dialing parity is attached to its Plan as Exhibit 1. The purpose of these notices is to provide information to the customer, not to discourage customers from selecting another provider or to direct customers toward the notifying carrier's service. AT&T's notice employs promotional techniques and strategies that are inconsistent with these guidelines.

AT&T's Notice states as follows:

As a valued AT&T Digital Link customer we are pleased to announce an enhancement to your AT&T Digital Link Service: the availability to intraLATA toll and interLATA (including international) pre-subscription.

This sentence attempts to augment AT&T's goodwill to its customers by incorrectly suggesting that AT&T has unilaterally authorized an "enhancement" to only certain customers, when in fact the FCC has mandated dialing parity for all local exchange customers.

AT&T's Notice also contains statements that may create doubts for the customers as to whether they should select another intraLATA carrier. It says:

Other companies will solicit your intraLATA toll and interLATA business. Before making a change, however, please remember that each company's raies, plans, and policies are different....Since AT&T Digital Link Service is an extension of your existing AT&T Long Distance Service, changing long distance carriers could affect your volume discount structure. You should also consider contacting your AT&T account representative for further details on the effect switching long distance companies would have on your liscount structure and your ability to meet your current long distance usage commitments, if any.

• • •

As always, we are grateful for your continued business. If you have any questions or wish to make a change, please contact our business office....

Rather than providing information, AT&T's Notice creates reservations in the minds of customers if they consider another carrier. U S WEST suggests that AT&T's Notice be revised in accordance with the statements contained in U S WEST's notice to customers.

In addition, AT&T's Plan says that the Notice will be sent to customers "provided that at least one ASR [Access Service Request] has been received from an alternate carrier." Notice to customers of the availability of dialing parity alternatives should not be dependent upon AT&T's receipt of an ASR. Customers should be notified of dialing parity to enable them to understand their choices. It is possible that other carriers are or may become available, without regard to AT&T's receipt of an ASR.

Requirement of Alternative Carriers

AT&T's Plan suggests that there may not be alternative carriers from which AT&T's local exchange customers may choose an intraLATA carrier. The absence of an alternative carrier fails to satisfy the requisites of a dialing parity plan in compliance with FCC Rules. Section 47 C.F.R. Section 51.5 defines "dialing parity" as follows:

The term "dialing parity" means that a person that is not an affiliate of a local exchange carrier is able to provide telecommunications services in such a manner that customers have the ability to route automatically, without the use of any access code, their telecommunications to the telecommunications service provider of the customer's designation from among 2 or more telecommunications service providers (including such local exchange carrier). [Emphasis added].

An absence of an alternative carrier to which an AT&T local exchange customer may subscribe and use 1-Plus dialing would result in AT&T's non-compliance with a threshold requirement of dialing parity.

Customer "Slamming" Protection

AT&T's Implementation Plan is silent on the processes it intends to employ, if any, on providing Preferred Interexchange Carrier freezes upon the accounts of its customers. U S WEST requests that AT&T provide additional information on this issue and allow interested parties to file comments on any such plan.

Dated this 7th day of May, 1999.

Respectfully submitted,

del h. hundes

Todd L. Lundy Senior Attorney U S WEST Communications, Inc. 1801 California, Suite 5100 Denver, CO 80202 (303) 672-2783

TL99-030



HEARTLAND TELECOMMUNICATIONS COMPANY of Low

"MNC"

Fax	Cover	Sheet	

Date: May 11, 1999 To: Harian Best

Number of Pages including cover sheet:

Fax Number: 605-773-3809

Phone Number: 605-773-3201

Subject:

Aciding Parity Pien changes From:

507-387-6813 Fax Numb 7:

Phone Number: 507-387-1728

Coalidential Ay Note: The documents accompanying this fax transmission contain confidential information belonging to the sender v ho is legally privileged. The information is intended only for the use of the individual or easily named above as recipient. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution or the taking of any action in reliance on or regarding the contents of this faxed information is society probibiled. If you have received this fax in error, please notify ut immediately by telephone to arrange for return of the original documents to us.

Comments:

75 tholas fel he out of the office this afternoon, please address any immediate questions to getrested at 507-386-3518 av Bill Vanderdline at 507-387-1886. Freke -Per.

Manhana Cartana Telephone Company / Mod-Communications, Inc. + 221 East History Clevest + P.O. Bar 3348 + Membero, MN: 56002-3248

n

May 11, 1999

Harlan Best South Dakota Public Utilities 500 E Capitol Pierre, SD 57501

Dear Harian,

Along with this note is the Heartland Telecommunications Company of Iowa customer and carrier notification letters. In response to your concerns, I have made the changes to the Dialing Parity plan and intend to file an amended plan as soon as possible. I'm trying to coordinate your concerns with those of the Iowa Utility Board as well, so our company has a single plan that will work for both states.

z

The changes address the timelines of carrier and customer notification. I plan to mail the carrier letter on May 17, 1999 and request participation notice by June 14, 1999. Based on the information received, a carrier information hist will be created, randomized and attached to the customer notification letter. This letter will be mailed on July 1, 1999 with the effective PIC change date as July 22, 1999. The customer will be able to change their IntraLATA PIC one time at no charge until October 29, 1999, providing the customer with 120 days to make a selection.

In addition, on page 3 of the Plan, under PIC Freeze, a corrotion will be made to reflect that on previously frozen accounts, the IntraLATA PIC freeze will be implemented onehundred and twenty days after the plan goes into effect or upon specific request.

I think this addresses all your concerns. If you have any additional questions, I can be reached at 507-387-1728. Thank you again for your call and this opportunity to correct this plan in a timely basis.

Sincerely,

at Burt

Patricia (Pat) Burt Tariff Analyst Heartland Telecommunications Company of Iowa

May 17, 1999

Carrier Name Carrier Address City, State, Zip

In accordance with the FCC order TC99-030, Heartland Telecommunications Company of Iowa is preparing to provide IntraLATA Equal Access effective July 22, 1999. Our customers will receive a notification letter with a list of carriers for their selection. We are providing this information to request each carrier to notify us of their intent to participate in IntraLATA 1+ dialing for our mutual customers.

F

If you wish to participate in IntraLATA Equal Access in our area, please respond by June 14, 1999 with information containing the name, address, CIC code and customer contact 800 number to:

> Bill VanderSluis, Access Planning Manager Heartland Telecommunications Company of Iowa PO Box 3248 Mankuto, MN 56002-3248

If you require trunking modifications, please submit an Access Service Request for rearrangements at the access tandem or Heartland end office using normal industry ASR procedures.

Heartland operates the end offices of Akron, Boyden, Doon, Hawarden, Hull, Ireton, Rock Rapids, Rock Valley and Sibley in Iowa LATA 630, the Host office CLLI is RCRPIAACDSO and the access tandem is Sioux City, IA. Heartland also operates the end offices of Bancroft and Lakota in Iowa LATA 632, the Host office CLLI is MNKTMNXM12T and the access tandem is Mason City IA. Heartland's OCN is 1109.

Note that you are the only recipient in your company of this letter, please direct it to others in your organization as needed.

Sincerely, Heartland Telecommunications Company of Iowa

Bill VanderSluis, Access Planning Manager

MCTC OPR. 5

Notice of Additional Choices for Local Long Distance Calling

You may now choose a long distance service provider for local long distance calling [long distance calls you place within your Local Access Transport Area (LATA)] just as you choose a long distance service provider for all your other long distance calls. I lowa LATAs are illustrated below.

Heartland Telecommunications Company of lowa currently provides your 1+ long distance calling service within your LATA. You may choose to change that by calling the company of your choice. Changing your LATA long distance service provider will not change your long distance service choice for calls outside your LATA or outside your state, nor will it change your existing local calling area.

In the coming months, companies that plan to offer long-distance service within your LATA may contact you through telemarketing, advertising, or direct mail. The information provided may help you make your choice since each company's rates, plans and policies differ.

Your selection will be effective on or about July 22, 1999. A list of companies and their toll free business office numbers is included with this notice. You may change your long distance provider for calls made within your LATA one time without incurring a \$5.00 service order charge until October 29, 1999. After that date, the \$5.00 service order charge will be applied to all changes.

If you do not elect to change, Heartland Telecommunications will continue to provide 1+ long distance service with in your LATA.

The Iowa Utilities Board has approved this notice.

Iowa LATAs

(insert map graphic)

100 0



By Facsimile and First Class Mail

RECEIVED

MAY 1 3 1999

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

FAX Received MAY 11 1990

May 11, 1999

William Bullard, Jr. Executive Director South Dakota Public Utilities Commission Capitol Building, 1st Floor 500 East Capitol Avenue Pierre, SD 57501-5070

MEADQUARTERS PO. 82x 66 29705 45.3* Advis Inne, South Descha 57037-0066 605.263.3301 RE: DTG Response to Staff Comments - Docket No. TC99-030

Dear Mr. Bullard, 037-0066

800.236.7501 Fea 605.263.3995 This is in response to the comments filed by the Commission Staff on May 7, 1999.

The customer notification letter will be changed as recommended by the Staff and filed in draft form for Commission approval.

Pay phones will be addressed in the plan and the revision will be filed with the Commission.

Item 30 listing the nonresponsive companies includes Dakota Telecommunications, Inc., which should be Dakota Telecommunications Systems, Inc. This company currently has no customers and will not be providing local exchange or toll service in the foreseeable future. Thus, no filing will be provided.

If you have any questions, please contact me. Thank you.

Sincerely,

liam P. Heaston

Corporate Counsel

CC:

Karen Cremer

TC 99-030



ROBERTS COUNTY TELEPHONE COOPERATIVE ASSOCIATION

MAIN STREET . BOX 197 . NEW EFFINGTON, SOUTH DAKOTA 57255-0197 (605) 637-5211 · FAX: (605) 637-5302 · EMAIL: rctc@tnics.com

May 10, 1999

Ms. Karen E. Cremer Staff Attorney **SD Public Utilities Commission** 500 East Capitol Pierre, SD 57501

RECEIVED

MAY 1 2 1999

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

Dear Ms. Cremer:

This letter is intended to inform you and the Commission that Roberts County Telephone Cooperative Association and its wholly owned subsidiary, RC Communications, Inc. began offering IntraLATA equal access or toll dialing parity, April 2, 1998.

If you have further questions, do not hesitate to call. Thank you.

Sincerely,

Harrington ela Harrington

General Manager



May 10, 1999

Executive Director South Dakota Public Utilities Commission Capitol Bldg., 1st Floor 500 East Capitol Ave. Pierre, SD 57501-5070

RECEIVED

MAY 12 179

RE: FiberComm, L.C. IntraLATA Toll Dialing Parity

SOUTH DAKOTA UPLIC

Dear Sir:

The purpose of this letter is to provide you with the status of FiberComm, L.C.'s (FiberComm) IntraLATA toll dialing parity, FiberComm will begin providing service with a presubscribed interexchange carrier selection process for both interLATA and intraLATA dialing parity. In addition, FiberComm does not currently have either end user or interexchange carrier customers.

FiberComm will offer exchange access to interexchange carriers as provided for in FCC NECA #4 tariff and its own Iowa Tariff #1. FiberComm will use non-discriminatory procedures for advising new customers of the option for interexchange carrier selection and provide a list of interexchange carriers, which have requested access service from FiberComm.

Should you have any questions regarding the status and requirements of FiberComm's toll dialing parity service offering, please feel free to contact either, myself at 712-252-20.20 or our consultant, Mr. Burnie Snoddy at 515-284-1616.

Sincerely,

James J. McKenna Vice President



May 11, 1999

Executive Director South Dakota Public Utilities Commission Capitol Bldg., 1st Floor 500 East Capitol Ave. Pierre, SD 57501-5070

RECEIVED

MAY 1 3 1999 SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

RE: FiberComm, L.C. IntraLATA Toll Dialing Parity

Dear Sir:

A letter previously sent stated lowa Tariff #1 instead of South Dakota Tariff #1. This has been corrected and is attached.

Sincerely,

fames J. Milenna

James J. McKenna Vice President

901 Steuben Street - Sioux City, Iowa 51101 - 712-252-2020 - 800-836-2472 - Fax: 712-258-8810 - www.fibercomm.net



May 11, 1999

Executive Director Scuth Dakota Public Utilities Commission Capitol Bidg., 1st Floor 500 East Capitol Ave. Pierre, SD 57501-5070

RECEIVED

MAY 1 3 1999

RE: FiberComm, L.C. IntraLATA Toll Dialing Parity

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

Dear Sir:

The purpose of this letter is to provide you with the status of FiberComm, L.C.'s (FiberComm) IntraLATA toll dialing parity, FiberComm will begin providing service with a presubscribed interexchange carrier selection process for both interLATA and intraLATA dialing parity. In addition, FiberComm does not currently have either end user or interexchange carrier customers.

FiberComm will offer exchange access to interexchange carriers as provided for in FCC NECA #4 tariff and its own South Dakota Tariff #1. FiberComm will use non-discriminatory procedures for advising new customers of the option for interexchange carrier selection and provide a list of interexchange carriers, which have requested access service from FiberComm.

Should you have any questions regarding the status and requirements of FiberComm's toll dialing parity service offering, please feel free to contact either, myself at 712-252-2 1/20 or our consultant, Mr. Burnie Snoddy at 515-284-1616.

Sincerely,

- Mina

James J. McKenna Vice President

901 Steuben Street - Sioux City, Iowa 51101 - 712-252-2020 - 900-838-2472 - Fax: 712-258-8810 - www.fibercomm.net



GOLDEN WEST TELECOMMUNICATIONS COOPERATIVE, INC.

A Golden West Company

HEADOLARITERS OFFICE P.O. Box 411 West, South Datests 57780-0411 Phone: 605/279-2161 Fax: 605/279-2727 DISTRICT BRANCH OFFICE P.O. Box 571 Hot Springs, South Delots 57747-0571 Phons: 605/745-3103 Fax: 605/745-3301

May 12, 1999

Bill Bulland, Executive Director South Dakota Public Utilities Commission State Capitol Building 500 East Capitol Ave. Piezre, South Dakota 57501 RECEIVED

MAY 1 3 1999

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

RE: Docket TC99-030 (Implementation Plan for IntraLATA Dialing Parity)

Dear Bill:

Please accept this letter of notification for filing in the above referenced Docket for IntraLATA Toll Dialing Parity of Golden West Telecommunications Cooperative, Inc.

Golden West Telecommunications Cooperative, Inc. began offering IntraLATA toll dialing parity in South Dakota at the same time as InterLATA dialing parity on June 28, 1994.

If Commission Staff or the Commissioners desire any additional information to supplement this filing, please advise.

Thank you for your assistance in filing and distributing this notification.

Sincerely,

Golden West Telecommunications Cooperative, Inc.

lin

Jack Brown, Management Consultant

"Bringing It All Together"

TELECOMMUNICATIONS COMPANY of Iowa

HEARTLAND

May 12, 1999

RECEIVED

Mr. William Bullard, Executive Director South Dakota Public Utilities Commission 500 East Capitol Pierre, SD 57501

MAY 1 3 1999

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

REF: TC-99-030

Dear Mr. Bullard:

In response to consumer concerns from you office, Heartland Telecommunications Company of Iowa is resubmitting the IntraLATA Dialing Parity Plan with the following changes. Enclosed is the original plus 10 copies.

On page 3 under PIC Freeze, wording has been changed to reflect that on frozen Billing Accounts, the IntraLATA PIC freeze will be implemented one hundred and twenty days after the plan goes into effect. On page 6 under End User Notification, the date for customer notification has been revised to July 1, 1999, from July 22. On page 7 under PIC Activity Charges, the deadline date for selection at no charge has been extended from August 16 to October 29, 1999, to provide the customer 120 days.

The customer and carrier notification letters have been attached to the plan for the Board's approval. I respectfully request this plan retain the original requested approval date of June 22, 1999. This time will allow Heartland to finalize a marketing plan and complete the necessary switch conversions. This plan will impact approximately 250 customers in adjacent portions of exchanges in Iowa, specifically West Hawarden and West Akron, South Dakota.

Please call me at (507) 387-1728 with any questions.

Sincerely,

atresia Burt

Patricia Burt Tariff Analyst Heartland Telecommunications Company of Iowa

Enclosure

221 E. HICKORY ST. P.O. BOX 3248 MANKATO, MN 56002-3248

1-600-792-4486 FAX 507-387-6778

Amended Plan -filed on May 12, 1999

Heartland Telecommunications of Iowa IntraLATA Equal Access Plan

Project Overview

Per FCC Order in Docket No. 96-98, released March 23, 1999, Heartland Telecommunications Company of Iowa has been directed to implement 1+ IntraLATA presubscription for its customers in the Sioux City LATA 630 and the DesMoines LATA 632. Heartland Telecommunications Company of Iowa serves the exchanges of Akron, Boyden, Doon, Hawarden, Hull, Ireton, Rock Rapids, Rock Valley and Sibley in the Sioux City LATA 630 and Lakota and Bancroft exchanges in the DesMoines LATA 632. When implemented, end users will have the opportunity to select a Carrier for their IntraLATA toll in the same manner as they currently select their InterLATA toll Carrier.

Heartland Telecommunications Company of Iowa's internal systems will carry two PICs on every account; one for InterLATA toll and the second for IntraLATA toll.

Customer service types included in this project are residence, business, and coin.

Heartland is currently the designated LATA toll provider for its customers.

1+ Network Routing

In the 1+ IntraLATA environment, when the end user places a 1+ IntraLATA toll call (using a Carrier other than Heartland Telecommunications Company of Iowa), it will be handled as 1+ InterLATA calls are handled today. The call will be routed to one of the selected Carrier's Points of Presence (POP) within the LATA and then will go over the Carrier's Feature Group D (FGD) Switched Access Service Trunks. The same routing occurs today when end users place IntraLATA calls using 101XXXX access.

The Carrier will continue to pay originating and terminating intrastate switched access charges where applicable.

Operator Service (0+ and 0-) and Directory Assistance (DA) Routing

0+ IntraLATA calls will be routed to the end user's Carrier of choice. When the end user dials 0+, the switch will determine their primary IntraLATA Carrier (PIC) and route the call accordingly. Heartland Telecommunications Company of Iowa's switches have been upgraded to accommodate this change.

Heartland Telecommunications Company of Iowa will continue to provide IntraLATA 0- and Directory Assistance. End users dialing 0- are advised that Heartland Telecommunications Company of Iowa is handling their call.

Network and System Requirements

Heartland Telecommunications Company of Iowa has upgraded software and operator office switches and will make changes to systems and processes to accommodate 1+/0+ IntraLATA service.

Regional Subscription System

PIC Selection

At implementation, Heartland Telecommunications Company of Iowa will continue to provide 1+ IntraLATA until the Customer or Carrier initiates a change. Carrier initiated PIC changes, whether InterLATA and/or IntraLATA, will be processed via the normal service change procedures. This would involve calling the Heartland Telecommunications of Iowa's Customer Care Center at 1-800-792-4486.

Conversion Status

During the conversion, Heartland Telecommunications Company of Iowa will provide, through their normal toll free number, status information for Customers or Carriers. The Customer Care Center will provide processing updates and status.

The number for the Customer Care Center is 1+800 792-4486.

Jurisdictional Indicator

Heartland Telecommunications Company of Iowa supports the three OBF recommended Jurisdictional Indicators (JIs).

JI	Definition	
В	IntraLATA Service/InterLATA Service (assumed international)	
A	IntraLATA Service	
E	InterLATA Service	

- If a Carrier submits a request with a JI of B, Heartland Telecommunications Company of Iowa will apply the requested PIC to both the IntraLATA and InterLATA service.
- If a Carrier submits a request with a JI of A, Heartland Telecommunications Company of Iowa will apply the requested PIC to the IntraLATA service.
- If a Carrier submits a request with a JI of E, Heartland Telecommunications Company of Iowa will apply the requested PIC to the InterLATA service.

Coin

Heartland Telecommunications Company of Iowa will select the primary Carrier for IntraLATA toll access on Heartland Telecommunications Company of Iowa public pay telephone accounts.

For subscription of semi-public pay telephones, premises owners will select and designate the primary Carrier for IntraLATA toll access.

For subscription of Customer Owned Coin Operated Telephones (COCOT), the COCOT owner will select and designate the primary Carrier for IntraLATA toll access.

PIC Freeze

Heartland Telecommunications Company of Iowa currently applies a customer initiated freeze request to a Billing Account. At the time of conversion, all f. izen Billing Accounts will continue to be frozen at the InterLATA level. On July 22, 1999, all frozen numbers will be frozen at the IntraLATA level one hundred and twenty days after the plan goes into effect.

IntraLATA PIC changes on frozen accounts are accomplished by:

- The end user calling into the Heartland Telecommunications Company of Iowa's Customer Care Centers to have a PIC change order issued.
- The Carrier contacting the Customer Care Center with the end user on-line to have a PIC change order issued.

Test Numbers

The following numbers can be used to validate the PIC for a line. The call to the test number must be made from the line being tested. A recording will then tell the caller who the Carrier is for the selected jurisdiction.

InterLATA Test Number

1+700 555-4141

IntraLATA Test Number

1+(home NPA) 700-4141

Customer Care Center Procedures

New Service

When an end user customer contacts Heartland Telecommunications Company of Iowa to place an order for new service, the local service needs will be addressed first. The customer will then be asked to select an IntraLATA toll Carrier. If the end user is undecided as to what Carrier to select, a list of participating Carriers will be read to them.

The end user must select both an IntraLATA and InterLATA provider. The IntraLATA PIC will be negotiated first, the InterLATA, second. After the Carrier selection is made, the service order will be issued to establish service.

Heartland Telecommunications Company of Iowa will accept and process all IntraLATA selections regardless of the IntraLATA Carrier chosen.

There are 4 distinct lists of the Carriers that provide service in the Heartland area. The lists are rotated and varied in reading to provide random listings in each reading.

Transfer of Service

Currently, when Heartland Telecommunications Company of Iowa negotiates a Transfer of Service (To and From order), Customer Care personnel ask if the end user wishes to retain the same InterLATA PIC at the new location as they had at the old location.

With the implementation of IntraLATA service, Customer Care personnel will also confirm whether the end user wishes to retain the same IntraLATA Carrier at the new location as they had at the old location.

After confirmation of the IntraLATA Carrier, confirmation of the InterLATA selection will be made.

Collection and Treatment

Current collection and treatment practices do not change with the implementation of IntraLATA equal access.

Heartland Telecommunications Company of Iowa Policy/Ethical Business Practices

Customer contact personnel can at no time utilize the call detail of an Interexchange Carrier to market or promote Heartland Telecommunications Company of Iowa's products or services.

Heartland Telecommunications Company of Iowa understands the need for ethical handling of accounts. All Customer Care personnel are trained to handle business in an ethical manner. Heartland Telecommunications Company of Iowa uses quality measurements continually to ensure end users and Carriers are handled fairly and correctly.

Billing and Collections

Bill Appearance

Same Carrier for IntraLATA and InterLATA toll

If the same Carrier is selected by the end user as their IntraLATA and InterLATA Carrier of choice, toll for both will be interspersed on the same page of the bill. The bill page will not be separated by InterLATA or IntraLATA toll.

If different Carriers are selected by the end user as their IntraLATA and InterLATA Carrier of choice, and the chosen Carrier has a billing agreement with 'leartland Telecommunications Company of Iowa to do toll billing on their behalf, the toll will be separated by jurisdiction by Carrier.

Same Carriers for IntraLATA and InterLATA toll

The Heartland Telecommunications Company of Iowa bill pages will be sorted in the order listed below:

- Heartland Telecommunications Company of Iowa summary pages
- IntraLATA/InterLATA PIC Carrier bill page
- 900 Carrier bill page
- Casual Carrier bill page

Different Carriers for IntraLATA and InterLATA toll

The Heartland Telecommunications Company of Iowa bill pages will be sorted in the order listed below:

- Heartland Telecommunications Company of Iowa summary pages
- IntraLATA PIC Carrier bill page
- InterLATA PIC Carrier bill page
- 900 Carrier bill page
- Casual Carrier bill page

PIC Change Charges

PIC change charges will appear in the Other Charges and Credits section on the bill page.

The following is an example of the how the charge will appear on the Other Charges and Credits (OC&C) page:

Long Dist Carrier Change \$XX.XX

If an end user has different IntraLATA and InterLATA Carriers and changes both at the same time, only one Long Distance Carrier Change charge is billed.

Implementation Schedule

Heartland Telecommunications Company of Iowa will submit their IntraLATA presubscription plan by April 22, 1999 to the Iowa Utility Board as ordered by the FCC.

Carrier Participation

Based on the order, Heartland Telecommunications Company of Iowa will provide a notification letter and participation form to all Carriers on May 17, 1999. Carriers interested in participating in 1+ IntraLATA presubscription must respond to Heartland Telecommunications Company of Iowa and provide required information by June 14, 1999.

Respondents will be placed on the end user notification in random and rotational order and no competing provider will be given advantage over another. Company names will be shown once for Carriers with multiple CIC codes.

Existing FGD

Existing Feature Group D Switched Access trunks accommodate both InterLATA and IntraLATA traffic. Carriers wishing to increase the number of their FGD trunks should follow the normal Access Service Request (ASR) process.

End User Notification

End users will be notified of their IntraLATA presubscription options starting July 1, 1999 as directed by the Iowa Utilities Board.

Customer Care Center Start Date

The Heartland Telecommunications Company of Iowa's Customer Care Center will accept IntraLATA PIC change orders beginning July 22, 1999.

The Heartland Telecommunications Company of Iowa's Customer Care Center will not recognize any IntraLATA PIC changes prior to the implementation date. Therefore, orders submitted prior to July 22, 1999 will be processed as an InterLATA PIC change.

Conversion Contact Number

During the conversion, Heartland Telecommunications Company of Iowa can be contacted on their toll free number for end users or Carriers to call.

The toll free number is 1-800-792-4486.

PIC Activity Charges

Heartland Telecommunications Company of Iowa filed an Intrastate tariff in Iowa for IntraLATA PIC change rates which mirror the rates currently approved in ICORE. Inc. Tariff F.C.C. No. 1.

Existing customers may make one selection of a primary IntraLATA Carrier without being assessed the IntraLATA PIC change charge through October 29, 1999.

Only the first IntraLATA PIC change that passes the Heartland Telecommunications Company of lowa order edits and is worked in the switch is counted as the PIC change for which the charge is waived. Subsequent PIC changes will be charged and billed accordingly.

Proposed IntraLATA Rates

The charges for an IntraLATA PIC change are as follows:

Per Telephone Exchange Service line/Trunk	\$ 5.00
Per Switched Access Lineside Connection	\$ 5.00
Per Centrex line	\$ 5.00
Per Pay Telephone line	\$ 5.00

PIC Dispute Rates

The charges for an unauthorized IntraLATA PIC change dispute are as follows:

\$ 35.65
\$ 35.65
\$ 35.65
\$ 57.57

If both the IntraLATA and InterLATA PICs are disputed at the same time, both the IntraLATA and InterLATA charge will apply.

May 17, 1999

Carrier Name Carrier Address City, State, Zip

In accordance with the FCC order TC99-030, Heartland Telecommunications Company of Iowa is preparing to provide IntraLATA Equal Access effective July 22, 1999. Our customers will receive a notification letter with a list of carriers for their selection. We are providing this information to request each carrier to notify us of their intent to participate in IntraLATA 1+ dialing for our mutual customers.

If you wish to participate in IntraLATA Equal Access in our area, please respond by June 14, 1999 with information containing the name, address, CIC code and customer contact 800 number to:

> Bill VanderSluis, Access Planning Manager Heartland Telecommunications Company of Iowa PO Box 3248 Mankato, MN 56002-3248

If you require trunking modifications, please submit an Access Service Request for rearrangements at the access tandem or Heartland end office using normal industry ASR procedures.

Heartland operates the end offices of Akron, Boyden, Doon, Hawarden, Hull, Ireton, Rock Rapids, Rock Valley and Sibley in Iowa LATA 630, the Host office CLLI is RCRPIAACDSO and the access tandem is Sioux City, IA. Heartland also operates the end offices of Bancroft and Lakota in Iowa LATA 632, the Host office CLLI is MNKTMNXM12T and the access tandem is Mason City IA. Heartland's OCN is 1109.

Note that you are the only recipient in your company of this letter, please direct it to others in your organization as needed.

Sincerely, Heartland Telecommunications Company of Iowa

Bill VanderSluis, Access Planning Manager

Notice of Additional Choices for Local Long Distance Calling

You may now choose a long distance service provider for local long distance calling [long distance calls you place within your Local Access Transport Area (LATA)] just as you choose a long distance service provider for all your other long distance calls. Iowa LATAs are illustrated below.

Heartland Telecommunications Company of Iowa currently provides your 1+ long distance calling service within your LATA. You may choose to change that by calling the company of your choice. Changing your LATA long distance service provider will not change your long distance service choice for calls outside your LATA or outside your state, nor will it change your existing local calling area.

In the coming months, companies that plan to offer long-distance service within your LATA may contact you through telemarketing, advertising, or direct mail. The information provided may help you make your choice since each company's rates, plans and policies differ.

Your selection will be effective on or about July 22, 1999. A list of companies and their toll free business office numbers is included with this notice. You may change your long distance provider for calls made within your LATA one time without incurring a \$5.00 service order charge until October 29, 1999. After that date, the \$5.00 service order charge will be applied to all changes.

If you do not elect to change, Heartland Telecommunications will continue to provide 1+ long distance service with in your LATA.

The Iowa Utilities Board has approved this notice.

Iowa LATAs

(insert map graphic)



Heartland Communications, Inc.

120 E. FIRST • P.O. BOX 48 • KIMBALL, SD 57355-0048 • PHONE (605) 778-6221 • FAX (605) 778-8080

May 13, 1999

RECEIVED

Bill Bullard, Executive Director South Dakota Public Utilities Commission State Capitol Building 500 East Capitol Ave. Pierre, South Dakota 57501

MAY 1 4 1999

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

RE: Docket TC99-030 (Implementation Plan for IntraLATA Dialing Parity)

Dear Bill:

Enclosed are revised Appendixes C & D with company specific information for filing in the above referenced Docket is the "Implementation Plan for IntraLATA Toll Dialing Parity" of Heartland Communications, Inc.

If Commission Staff or the Commissioners desire any additional information to supplement this filing, please advise.

Thank you for your assistance in filing and distributing these documents.

Sincerely,

Mark D. Benton, Manager

(REVISED VERSION) APPENDIX C

Date:

To: All Customers of Heartland Communications, Inc.

Heartland Communications, Inc. is pleased to announce that effective July 22, 1999, we will make it possible for you to choose from various long distance comparies for your in-state 1+ long distance service (intraLATA long distance service). This service includes all of your intrastate long distance calls made by dialing 1 plus the area code and local telephone number. With these changes, you will have the ability to select a long distance company for your in-state 1+ long distance service.

In conjunction with making these changes, Heartland Communications is asking all of its local exchange subscribers to choose whether they wish to retain the current long distance company providing their in-state 1+ long distance service or select another company for the service.

Currently Heartland Long Distance provides your in-state 1+ long distance service. This company will continue to provide service to you unless you tell us to make a change and select another carrier. If you do nothing, your in-state 1+ long distance service will remain with Heartland Long Distance.

Attached is a list of long distance companies, in addition to Heartland Long Distance, that have agreed to provide 1+ in-state long distance services in your area. If you would like one of these other companies to provide your service, please complete the customer response form that is also attached and return it to our business office postmarked by no later than July 12, 1999.

You will not be charged for making a change to your existing in-state 1+ long distance service in response to this notice. In addition, for a period of 60 days after July 22, 1999, you may decide to change your in-state 1+ long distance carrier, one time, at no charge. After September 20, 1999, you will incur a Primary Interexchange Carrier (PIC) charge of \$5.00 for changing carriers.

Please call our office at 605-337-2874 if you have any questions on this matter.

Sincerely,

Heartland Communications, Inc.

LIST

Listed below are the other Long Distance companies that are willing to offer you IntraLATA 1+ (generally in-state) long distance services. If you wish to change your intraLATA 1+ long distance carrier, please complete the attached form and return it postmarked by July 12, 1999, to Heartland Communications, Inc., PO Box 48, Kimball, SD 57355.

ABC Telephone Company, Inc. Bus/Res: 1-800-555-1234

LMNOP Telecommunications Bus: 1-800-555-2345

ZXC Telephone Company Bus/Res: 1-800-555-3456

Please respond on or before July 12, 1999.

(Revised Version) APPENDIX D

In-State 1+ Long Distance Service (IntraLATA Long Distance Service) Customer Response Form (Please print)

Subscriber Billing Name:

Billing Address:

(City, State, Zip)

Please change my long distance company for in-state (IntraLATA) 1+ long distance calls:

Telephone Number(s)

I authorize Heartland Communications, Inc. to make the above carrier change(s). I understand that only one carrier may be designated as my intraLATA or in-state preferred interexchange carrier (PIC) for any one telephone number.

X Subscriber's Signature (Required)

X Date (Required)

Carrier Name

NOTE: You do not need to return this form if you wisb to retain your current intraLATA or 1+ in-state long distance carrier, Heartland Communications, Inc.

11

TC99-030



Donald Low Senior Atomes State Regulatory Affairs/Mountain Region 8140 Ward Parkway Karsas Cay, MO 64114 Voice 913 624 6865 Fax 913 624 6861

don a los @mail sprint.com

May 12, 1999

RECEIVED

MAY 1 4 1999

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

William Bullard Executive Director South D. kota Public Utilities Commission 500 E. Capitol Ave. Pierre, SD 57501

Re: Dkt. No. TC 99-030

Dear Mr. Bullard:

Staff's recommendations/comments in the intraLATA dialing parity matter noted that a number of LEC's, including Sprint Communications Company L.P., had not filed implementation plans. I apologize for neglecting to inform the Commission of Sprint's views on this matter. Simply stated, we read the FCC order to apply only to LEC's that are providing local services. Although certificated to do so, Sprint has not yet commenced provision of local exchange services in South Dakota. Sprint would plan on filing an intraLATA 1+ implementation plan when it files its local exchange tariffs and before providing local service.

I hope this addresses Staff's concerns. Please contact me if the Commission or Staff has any questions.

Very truly yours,

Don Low

cc: Karen Cramer

TC99-030



SANCOM INC.

Service Takes Commitment

May 13, 1999

Karen E. Cremer, Staff Attorney South Dakota Public Utilities Commission 500 East Capitol Pierre, SD 57501 RECEIVED

MAY 1 4 1999

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

REF: Intralata Dialing Parity

Dear Ms. Cremer:

In February 1999 Sancom, Inc. decided to offer Intralata dialing parity to all its business, residence and COCOT telephone subscribers. At this time we started to formulate our plan.

By the middle of March 1999 we felt we had a reasonable plan for all parties concerned. We then put our plan into action.

On March 23, 1999 the Federal Communications Commission issued it's Intrastate Dialing Parity order.

On April 19, 1999 letters were mailed to all our business, residence and COCOT telephone subscribers. This letter contained the names and toil free telephone numbers of all responding long distance providers connected at SDN. We gave a window for a free PIC change through close of business on June 30, 1999. Subscribers were also informed after this initial period was over, PIC changes would be charged at the rate of \$5.00 per each occurrence.

As our plan was in place before any orders were handed down, time and funds had already been expended, we proceeded with the plan.

Sancorn, Inc. will not be asking for cost recovery.

Sincerely,

Ken

Gene Kroell, General Manager



P.O. Box 308 ♥ Woonsocket, S.D. 57385-0308 Toll-Free 1-838-978-7777 ♥ Fax 1-605-796-4419



TC99-030



RECEIVED

MAY 1 4 1999

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

May 11, 1999

Karen E. Cremer South Dakota Public Utilities Commission 500 East Capitol Pierre, SD 57501

RE: IntraLATA Toll Dialing Parity Plans

Dear Ms. Cremer,

In response to staff inquiry regarding intraLATA dialing parity plans, LCI International Telecom Corporation received CLEC authority on 10/3/97, docket no. TC 97-067. However, LCI not currently providing competitive local exchange services in South Dakota and has no immediate plans to begin offering such service. If however our business plans change, we will notify you in advance.

If you should need other information, please contact me at 703-363-3821.

Sincerely,

Chan

Chris Tran Regulatory Analyst, Government Affairs

TC99-030



VCE-A win / owned subsidiary of Sully Buttes Telephone Cooperative, Inc.

May 14, 1999

RECEIVED

MAY 1 7 1999

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

Public Utilities Commission State of South Dakota 500 E. Capitol Avenue Pierre, SD 57501

Dear Commission & Staff:

We recently received documentation concerning PUC staff comments on intralata toll dialing parity plans which have been filed in your office. Within the comments it was suggested that Sully Buttes Telephone Coop. Inc. provide the Commission with the date we began offering intralata toll dialing parity to the SBTC exchanges. In response, we offer the following information: Letters notifying the customers of dialing parity availability were dated January 5, 1992. Our final implementation date was April 28, 1992.

Should you have questions or request more information, please contact me at 605-852-2224.

Sincerely,

SULLY BUTTES TELEPHONE COOPERATIVE, INC.

anice Volek

fanice Volek Administrative Assistant

TC99-030



- COMMUNICATIONS, INC. - INTERNET

RECEIVED

MAY 1 7 1999

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

Mr. William Bullard Jr. Public Utilities Commission 500 East Capital PO Box 5070 Pierre, SD 57501

RE: IntraLATA Dialing Parity

Dear Mr. Bullard:

May 14, 1999

I am replying to the May 10, 1999 Staff Comments on intraLata Dialing Parity Plans.

Please accept this letter as confirmation that Valley Cable & Satellite Communications, Inc. has offered intraLATA toll dialing parity to its customers as of April 1, 1999.

Please do not hesitate to call me with any questions regarding this matter.

Sincerely,

Quarter Quartice

Dianna J. Quaschnick. General Manager

cc

TC99-030 The Regulatory Compliance Group, Inc.

May 11, 1999

VIA CERTIFIED MAIL

South Dakota Public Utility Commission Attn: Ms. Karen E. Cremer, Staff Attorney 500 East Capitol Pierre, SD 57501

RECEIVED

MAY 1 7 1999

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

Re: Atlas Communications, Ltd/Telco Partners, Inc/Main Street Telephone Co. IntraLATA Toll Dialing Parity Plan

Dear Sir or Madam,

Pursuant to your recent Notice dated May 10, 1999, Atlas Communications, Ltd., Telco Partners, Inc. and Main Street Telephone Company are not presently providing local service in the State of South Dakota; and therefore, are requesting an exemption from filing IntraLATA Toll Parity Plans. All of these companies will file IntraLATA Toll Dialing Parity Plans for approval with the South Dakota Public Service Commission not later than sixty (60) days prior to offering Local Exchange service. If you have any questions concerning this information, please do not hesitate to contact me.

Thank you for your time and attention to this matter.

Sincerely 11 6 1 5

Jack Medaris, Regulatory Compliance Mgr. Regulatory Compliance Group, Inc.

jen Enclasures

484 Norristown Road, Suite 123, Blue Bell, PA 19422 (610) 834-1860

From: South Dakota PUC To: Frank Scandino

Date 5/10/99 Time: 2 22 04 PM

Page 1 of 8

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF SOUTH DAKOTA

IN THE MATTER OF THE FCC ORDER ESTABLISHING NEW DEADLINES FOR IMPLEMENTATION OF INTRALATA DIALING PARITY BY LOCAL EXCHANGE CARRIERS STAFF COMMENTS ON INTRALATA TOLL DIALING PARITY PLANS TC99-030; TC99-041; TC99-042; TC99-043; TC99-046; TC99-047

On March 23, 1999, the Federal Communications Commission (FCC) issued an order establishing new deadlines for implementation of intraLATA dialing parity by local exchange carriers (LECs). In the Matters of Implementation of the Local Competition Provisions of the Telecommunications Act of 1996; Petition of Southwestern Bell Telephone Company. Pacific Bell, and Nevada Bell for Expedited Declaratory Ruling on Interstate IntraLATA Toll Dialing Parity or, in the Alternative, Various Other Relief, CC Docket No. 96-98, FCC 99-54 (released March 23, 1999). The order states that "[n]o later than April 22, 1999, all LECs must file intraLATA toll dialing parity plans with the state regulatory commission for each state in which the LEC provides telephone exchange service if a plan has not yet been filed with such state commission. Once a state commission has approved a plan, the LEC must implement its plan no later than 30 days after the date on which the plan is approved." Id. at ¶7. If the state commission has not acted on the plan by June 22, 1999, the LEC must file the plan with the Common Carrier Bure au of the FCC. Id.

At its March 30, 1999, meeting, the Public Utilities Commission (Commission) opened a docket in order to review intraLATA toll dialing plans and established a procedural schedule that would allow other parties to file written comment on the LECs' intraLATA toll dialing plans. No parties objected to this proposal. At its April 1, 1999, meeting, the Commission issued guidelines for LECs to follow when developing their intraLATA toll dialing plans. On the issue of cost recovery, the Commission decided that if a LEC believes that it needs cost recovery, the LEC should file for cost recovery in a separate proceeding before the Commission in accordance with FCC rules.

On April 23, 1999, the Commission faxed notice that the following companies had filed intraLATA toll dialing parity plans. Heartland Telecommunications Company of Iowa on April 20, 1999; Accent Communications, Inc. on April 20, 1999; Splitrock Properties, Inc. on April 21, 1999; Jefferson Telephone Company on April 21, 1999; Venture Communications, Inc. on April 21, 1999; Hanson County Telephone Company on April 21, 1999; Vivian Telephone Company d/b/a Golden West Communications, Inc. on April 21, 1999; Stockholm Strandburg Telephone Co on April 22, 1999; AT&T Communications of the Midwest, Inc. on April 22, 1999; Midco Communications on April 22, 1999; Heartland Communications, Inc. on April 22, 1999; Mobridge Telecommunications on April 22, 1999; West River Telecommunications Cooperative on April 22, 1999, Dakota Telecommunications Group, Inc., DTG Communications, Inc. on April 22, 1999; and U S WEST Communicatiors, Inc. on April 22, 1999.

The following local exchange carriers notified the Commission that they have completed conversion to intraLATA dialing parity. Fort Randall Telephone Company on April 21, 1999; Mt. Rushmore Telephone Company on April 21, 1999; CommChoice, LLC on April 22, 1999; and Kadoka on April 26, 1999.

Dickey Rural Telephone Cooperative, Dickey Rural Communications, Inc. Consolidated Telephone Cooperative and Consolidated Telcom, Inc. formerly known as CTC Communications, Inc. petitioned the Commission for a suspension and modification of the requirement for implementation of intraLATA dialing parity in its service areas until June 30, 2000.

Kennebec Telephone Company filed its intraLATA toll dialing parity implementation plan and, pursuant to ARSD 20:10:32:39 and 47 U.S.C. 251(f)(2), a petitioned for suspension and modification of the requirement for implementing intraLATA dialing parity until September 19, 1999.

Western Telephone Company filed its intraLATA toll dialing parity implementation plan and, pursuant to ARSD 20:10:32:39 and 47 U.S.C. 251(f)(2), a petition for suspension and modification of the requirement for implementing intraLATA dialing parity until September 15, 1999.

Beresford Municipal Telephone Company filed its intraLATA toll dialing parity implementation plan and, pursuant to ARSD 20:10:32:39 and 47 U.S.C. 251(f)(2), a petition for suspension and modification of the requirement for implementing intraLATA dialing parity until September 15, 1999.

COMMISSION STAFF'S RECOMMENDATION

Commission Staff has reviewed the toll dialing parity plans filed by the aforementioned companies utilizing the guidelines as established by the Commission in its April 1, 1999, order. Staff then categorized the companies and will make its recommendations using these categories.

SDN COMPANIES

Heartland Communications Inc., Accent Communications, Inc., Splitrock Properties, Inc., Venture Communications, Inc., Hanson County Telephone Company, Hanson Communications, Inc. d/b/a McCook Telecom, Stockholm Strandburg Telephone Co., Mobridge Telecommunications, Stateline Telecommunications, Inc., Vivian Telephone Company d/b/a Golden West Communications, Inc. all requested Commission approval to send out its carrier notification letters in advance of final Commission action on the proposed plan with the carrier notifications completed by June 1, 1999. Staff would recommend that the Commission grant the companies approval to send out its carrier notification letter (Appendix A and B) in advance of final Commission action on the proposed plan. Staff would further recommend that the language in the customer notification letter (Appendix C) be amended to state that the customer, if they choose to change their intraLATA long distance carrier, directly contact the Staff would also recommend that Accent Communications, Inc.'s letter to its customers (Appendix C) Include a statement that after the 60 day grace period has expired, that there will be a charge to change carriers and the letter should state the amount of the charge.

Heartland Communications, Inc. did not file a customer letter (Appendix C) that was company specific. Staff would recommend that the company file such a letter before final approval of the plan.

Jefferson Telephone Company has filed an amendment to its plan asking that its carrier notification letter be approved no later than May 14, 1999. Staff would recommend approval of this amendment.

Staff would note that none of the aforementioned companies addressed the issue of pay phones in their plans and Staff would recommend that they amend their filing to address this issue.

END OFFICE

Dakota Telecommunications Group, Inc., DTG Community Telephone, Inc. and Dakota Telecom, Inc. and West River Telecommunications Cooperative requested Commission approval to send out its carrier notification letters in advance of final Commission action on the proposed plan. Staff would recommend that the Commission grant the companies approval to send out its carrier notification letter (Appendix A for both companies and also Appendix B for West River) in advance of final Commission action on the proposed plan. Staff would further recommend that the language in the customer notification letter be amended to state that the customer, if they choose to change their IntraLATA long distance carrier, directly contact the long distance company that they have chosen in order to initiate that change with the LEC. This will not only allow the customer to pick a plan that best suits their needs but it will ensure that a LOA is processed or that third-party verification will occur.

Staff would note that neither of the aforementioned companies addressed the issue of pay phones in their plans and Staff would recommend that they amend their filing to address this issue.

USWEST

U S WEST Communications, Inc. requested Commission approval to send out its carrier notification letters in advance of final Commission action on the proposed plan. Staff would recommend that the Commission grant t is company approval to send out its carrier notification letter in advance of final Commission action on the proposed plan. U S WEST has stated in its filing that it will file a waiver with the FCC requesting an extension of time to implement toll dialing parity in the McIntosh. Timber Lake and Morristown exchanges According to the Commission's order setting forth the guidelines to be followed, U S WEST is to describe how it will offer dialing parity for each exchange and its proposed time schedule. U S WEST has not listed its exchanges nor has its asked this Commission for a waiver to extend the time to implement toll dialing parity in the McIntosh, Timber Lake, and Morristown exchanges. Staff recommends that U S WEST list the exchanges individually with the NXX provided so that carriers know which exchanges are included and that U S WEST's toll dialing parity plan be applied to all its exchanges within the state.

In U S WEST's customer notification letter (Exhibit A), U S WEST requires the customer to contact U S WEST to remove the "pic frc ize" prior to selecting an intraLATA carrier if it is a carrier other than U S WEST. Since this is the first time a customer can select an intraLATA carrier there should be no "freeze" associated with intraLATA long distance. Staff would recommend that U S WEST be required to remove this paragraph from the customer letter.

When taking orders from new or existing customers U S WEST proposes to respond to a customer's request for further information as to U S WEST's toll products and services at that time. Staff would recommend that should a customer request further information as to U S WEST's toll products and services that the customer be transferred to U S WEST's marketing/sales representatives.

U S WEST's plan allows customers to change their intraLATA carrier one time free of charge during the first 30 days following implementation. Staff would recommend that the grace period be a minimum of 60 days. This would allow the customer to receive at least one bill from the intraLATA carrier.

U S WEST is requesting that MTS be classified as fully competitive effective July 22, 1999. Staff would recommend denial of this request. Such a request should be considered in a separate docket.

AT&T

Staff would recommend that AT&T make a full disclosure to new and existing customers that if they do not indicate a preference for an alternate carrier, that the customer's traffic will by default go to AT&T. Staff would also recommend that AT&T remove from the customer letter (Exhibit 1) the requirement that the customer who wishes to change carriers, that they contact AT&T's business office first.

Staff would recommend that the language in the customer notification letter (Exhibit 1) be amended to state that the customer, if they choose to change their intraLATA long distance carrier, directly contact the long distance company that they have chosen in order to initiate that change with the LEC. The letter should include a list of long distance providers to choose from and their toll free numbers

so that the customer can contact the long distance companies. This will not only allow the customer to pick a plan that best suits their needs but it will ensure that a LOA is processed or that third-party verification will occur.

Staff would note that AT&T did not address the issue of pay phones in its plan and Staff would recommend that it amend its filing to address this issue.

MIDCO

Staff would recommend that the customer notification letter (Exhibit A) be rewritten to be "more customer friendly" and less technical. The letter should have the customer directly contact the long distance company and should include a list of long distance providers to choose from and their toll free numbers so that the customer can contact the long distance companies and decide which rate plan best suits their needs. This will ensure that a LOA is processed or that third-party verification will occur. Also Midco should be definitive as to whether or not there will be a PIC charge.

Staff would note that Midco did not address the issue of pay phones in its plan and Staff would recommend that it amend its filing to address this issue.

FOREIGN

Heartland Telecommunications Company of Iowa filed its plan without including its exchanges and NXX numbers, carrier notification letter, and customer notification letter. Staff would recommend that these documents be filed before final approval of the plan.

Staff would note that Heartland did not address the issue of pay phones in its plan and Staff would recommend that it amend its filing to address this issue.

SUSPENSION AND MODIFICATION

Dickey Rural Telephone Cooperative, Dickey Rural Communications, Inc., Consolidated Telephone Cooperative and Consolidated Telcom, Inc. formerly known as CTC Communications, Inc., Kennebec Telephone Company, Western Telephone Company, and Beresford Municipal Telephone Company all filed their toll dialing parity plans requesting suspension and modification of its plan.

Dickey Rural Telephone Cooperative, Dickey Rural Communications, Inc., Consolidated Telephone Cooperative and Consolidated Telcom, Inc. formerly known as CTC Communications, Inc. state that suspension and modification are necessary to avoid imposing requirements that are unduly economically burdensome and infeasible, and that suspension and modification are consistent with the public interest, convenience and necessity. Staff would recommend denial of suspension and modification as Dickey Rural Telephone Cooperative, Dickey Rural Communications, Inc., Consolidated Telephone Cooperative and Consolidated Telcom, Inc. formerly known as CTC Communications, Inc. did not prove in its filing that providing intraLATA toll dialing parity requires suspension and modification and require the companies to file intraLATA toll dialing parity plans consistent with the Commission's prior orders.

Kennebec Telephone Company began implementing intraLATA dialing parity in conjunction with its implementation of interLATA dialing parity the day before the FCC issued its order ordering LEC's to implement intraLAT \ toll dialing parity. Kennebec states in its petition that to alter the plan already in process would be unduly economically burdensome, technically infeasible, and inconsistent with public interest. Staff would recommend that granting approval of Kennebec's petition for suspension and modification until September 19, 1999.

Western Telephone Company and Beresford Municipal Telephone Company filed their intraLATA toll dialing parity plans requesting suspension and modification due to ongoing negotiations and no decisions being reached regarding whether or not intraLATA dialing parity will be provided by SDN as centralized equal access or if it will be provided from its end offices. Staff would recommend granting approval of Western's petition for suspension and modification until September 15, 1999. Staff would further recommend that the language in the customer notification latter (Appendix C) be amended to state that the customer, if they choose to change their intraLATA long distance carrier, directly contact the long distance company that they have chosen in order to initiate that change with the LEC. This will not only allow the customer to pick a plan that best suits their needs but it will ensure that a LOA is processed or that third-party verification will occur.

Staff would note that none of the aforementioned companies, with the exception of Kennebec, addressed the issue of pay phones in their plans and Staff would recommend that they amend their filing to address this issue.

MISCELLANEOUS

Valley Cable & Satellite Communications, Inc. sent a copy of a customer letter to the Commission on March 26, 1999. Sancom, Inc. sent the Commission a copy of its carrier letter on April 1, 1999. Staff would recommend that the companies file a letter with the Commission confirming that they offer intraLATA toll dialing parity and the date of such offering.

NON-RESPONDENTS

Staff would note that the following LECs did not file any plans with the Commission:

- 1. Farmers Mutual Telephone Cooperative, Ellendale, ND
- 2 GTE of Minnesota, Minneapolis, MN
- 3 Great Plains Communications, Blair, NE
- RT Communications, Inc., Worland WY
- 5 Red River Telecom, Inc., Abercrombie, ND
- 6 Three River Teleco, Lynch, NE

- U S WEST Communications of Iowa
- 8. U S WEST Communications of Nebraska
- U S WEST Communications of Minnesota
- Valley Telephone Company, Browns Valley, MN
- 11. NebCom, Inc. Jackson, NE
- 12. Baltic Telecom Cooperative, Baltic, SD
- 13. Brookings Municipal Utilities, Brookings, SD
- 14. Interstate Telephone Cooperative, Clear Lake, SD
- 15. James Valley Cooperative Telephone, Groton, SD
- McCook Cooperative Telephone Company, Salem, SD
- 17. Midstate Telephone Company, Kimball, SD
- 18 Sanborn Telephone Cooperative, Woonsocket, SD
- 19. Sioux Valley Telephone Company, Dell Rapids, SD
- 20. Splitrock Telecom Cooperative, Inc., Garretson, SD
- 21. Sully Buttes Telephone Cooperative, Highmore, SD
- 22. Tri-County Mutual Telephone Company, Emery, SD
- 23. Valley Telecommunications Cooperative, Herreid, SD
- 24. Golden West Telecommunications Cooperative, Inc., Wall, SD
- 25. West River Cooperative Telephone Company, Bison, SD
- 26. Cheyenne River Sicux Tribe Telephone Authority, Eagle Butte, SD
- 27. Atlas Communications, Ltd., Denver, CO
- 28. Black Hills FiberCom, LLC, Rapid City, SD
- 29. Crystal Communications, Inc., Mankato, MN
- 30. Dakota Telecommunications, Inc., Irene, SD
- 31. Easton Telecom Services, Inc., Richfield, OH
- 32. Eclipse Communications Corporation, Issaquah, WA
- 33. Excel Telecommunications, Inc., Dallas, TX
- 34. F.D.S.D. Rapid City, Inc., Rapid City, SD
- 35. FiberComm, L.C., LeMars, IA
- 36. FirsTel, Inc., Sioux Falls, SD
- 37. GLD, Group Long Distance, Inc., Fort Lauderdale, FL
- 38. LCI International Telecom Corporation, McLean, VA
- 39. LDM Systems, Inc., New City, NY
- MCImetro Access Transmission Services, Inc., Vienna, VA
- 41. McLeodUSA Telecommunications Services, Inc., Cedar Rapids, IA
- 42. Northern Valley Communications, L.L.C., Bath, SD
- 43. PAM Oil Inc. d/b/a PAM Communications, Sioux Falls, SD
- 44. Quintelco, Inc., Pearl River, NY
- 45. Sioux Falls Cable Television, Sioux Falls, SD
- Sprint Communications Company L.P., Kansas City, MO
- 47. Sterling International Funding, Inc. d/b/a Reconex, Hubbard, OR
- 48. Telco Holdings, Inc. d/b/a Dial & Save, Chantilly, VA
- 49 Tel-Save, Inc. d/b/a The Phone Company, Inc., New Hope, PA
- 50. WorldCom Technologies, Jackson, MS
- 51 Bridgewater-Canistota Independent Telephone Company, Hartford, SD
- 52 RC Communications, Inc., New Effington, SD
- 53 East Plains Telecom, Inc., Baltic, SD

Con Luin

- 54. Roberts County Telephone Cooperative Association, New Effington, SD
- 55. Union Telephone Company, Hartford, SD
- 56. Armour Independent Telephone Company, Armour, SD
- 57. Faith Municipal Telephone, Faith, SD

Staff would recommend that these companies file a letter with the Commission stating the date that it began offering intraLATA toll dialing parity in South Dakota.

8

Dated this 7th day of May, 1999.

arm E. Cremer

Kanin E. Cremer Stall Attorney South Dakota Public Utilities Commission 500 East Capitol Pierre, SD 57501 Telephone (605) 773-3201

TC99-030



1635 Front Street . P. O. Box 500 . Blair, Hebraska 68000

May 12, 1999

Karen E. Cremer Staff Attorney South Dakota Public Utilities Commission 500 East Capitol Pierre, SD 57501 RECEIVED

MAY 1 7 1999

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

Dear Ms. Cremer

RE: Great Plains Communications Intralata Dialing Parity Plan

Thank you for your response to my voice mail.

I am enclosing a copy of our Intralata Dialing Parity Plan, which was approved by the Nebraska Public Service Commission on October 13.

I show that on October 30, 1998, I submitted a copy of the Plan to the South Dakota, Kansas, and Colorado Commissions. I have included a copy of the South Dakota letter.

If you have any questions or concerns regarding our plan, please feel free to call me at 402-426-6437.

Sincerely

Party A. Tupp

Kathy H. Tripp Special Services Manager

Enclosure: Great Plains Communications Intralata Dialing Parity Plan



1635 Front Street . P. O. Box 500 . Blair, Nebraska 68008

October 30, 1998

Mr. William Bullard South Dakota Public Utilities Commission State Capitol Building 500 East Capitol Avenue Pierre, SD 57501-5070

RE: Nebraska Docket C-1128

Dear Mr. Bullard

Enclosed please find a copy of Great Plains Communications Intralata Dialing Parity Plan.

If you have questions, please contact me at 402-426-9511, Ext. 437.

Sincerely

pathy A. Tripp

Kathy H. Tripp Special Services Manager

Enclosures: Intralata Dialing Parity Plan

Nebraska Public Service Commission

300 The Atrium, 1200 N Street

(402) 471-3101

P.O. Box 94927 Nebraska Consumer Hot Line 1-800-528-0017 Lincoln, Nebraska 68509-4927 Fax (402) 471-0254



October 13, 1998

Kathy H. Tripp Great Plains Communications 1635 Front Street PO Box 500 Blair, NE 68008

Dear Ms. Tripp:

On October 5, 1998, the Commission received the equal access dialing plan you submitted on behalf of Great Plains Communications.

The plan has been prepared in a very thorough manner, and addresses the key elements as required in the Commission's dialing parity order C-1128, Progression Order No. 4. Staff also believes the method proposed for cost recovery appears appropriate.

Today the Commission adopted the staff recommendation to approve these plans and this action will be reflected in our minutes.

Sincerely,

Maurice Gene Hand Director of Communications

MGH:rp

COMMERSIONERSI ANNE C. BOYLE LOWELL C. JOHNSON ROD JOHNSON FRANK E. LANDIS DANEL G. URWILLER

EXECUTIVE DIRECTOR: ROBERT R. LOGSDON

Preside with pay will prively recycled page



1635 Front Street • P.O. Box 500 • Blair, Nebraska 68008 • 402-426-9511

October 1, 1998

Mr. Gene Hand, Director of Communications Nebraska Public Service Commission 1200 N Street, 300 The Atrium Lincoln NE 68509

Dear Mr. Hand:

Pursuant to NPSC Docket C-1128, P.O. 4, enclosed please find Great Plains Communications' IntraLATA Dialing Parity Plan, including:

- 1) Great Plains Communications Office Practice describing the plan
- 2) General Implementation Time Line
- Carrier notification memo and response form to be sent to interexchange carriers currently providing 1+ interLATA service to Great Plains Communications customers
- Carrier notification memo to be sent to Nebraska cartified interexchange carriers that do not currently provide 1+ interLATA service to Great Plains Communications customers
- 5) Carrier notification memo to be seni: to incumbent intraLATA 1+ provider
- Customer notification letter and accompanying LATA map and customer response form for customers in the US West LATAs
- Customer notification letter and accompanying LATA map and customer response form for customers in the Aliant LATAs
- Tariff pages to be filed with an effective date of April 1, 1999
- Attachment A Detailed Timeline
- 10) Attachment B Cost Recovery

Please call me with any questions you may have regarding this plan.

Sincerely,

Kathy Tripp Special Services Manager

Enc.

Great Plains Communications General Implementation "Ime Line

- Carrier Notification Completed by: December 8, 1998
- Carrier Response Due by: January 31, 1999
- Customer Notification Completed by: See Attachment A
- Due Date for Customer Response Forms: See Attachment A
- ♦ Tariff filing date: October 1, 1998
- ♦ IntraLATA Dialing Parity Implementation Date: See Attachment A
- End of 90 Day Grace Period for Changing IntraLATA Carrier Without Charge: See Attachment A

Date: December 8, 1998

To: (Carrier Name)

From: Great Plains Communications

RE: IntraLATA Dialing Parity

On the dates shown on Attachment A, Great Plains Communications will implement IntraLATA Dialing Parity, a/k/a IntraLATA Equal Access. Great Plains Communications has already converted to InterLATA Equal Access; therefore, a formal bailoting process will not be part of this conversion. Customers will be given an opportunity to select a different long distance carrier for their intraLATA calls, and because you already provide interLATA service to our customers, your name will be listed as an intraLATA provider option. Customers who do not select an intraLATA carrier will be assigned to their current provider in the U S West 402 and 308 LATAs. In the Aliant 402 LATA, Aliant has chosen not to be considered as an intraLATA provider option. Therefore, customers in the Aliant 402 LATA will be required to select a different long distance carrier for their intraLATA calls.

We will provide you with customer information for those customers that select you as their intraLATA provider as we receive it. We will provide this information in the same medium being used today for interLATA customer information.

Please return the bottom portion of this letter and the enclosed Attachment A by January 31, 1999, to ensure we are processing this information correctly.

(Carrier Name) elects to be an intraLATA toll provider for (please indicate on the attached sheet)

Yes

CIC

Signature	Date
Contact Name:	(please print)
Telephone Number:	
E-mail:	
Fax Number:	

Date: December 8, 1998

To: (Carrier Name)

- From: Great Plains Communications Attn: IntraLATA Equal Access PO Box 500 Blair NE 68008-9908
- RE: IntraLATA Dialing Parity Implementation

Great Plains Communications provides local exchange service to approximately 33,000 access lines in 71 exchanges in Nebrasia. The enclosed Attachment A identifies all of the exchanges as well as the tandem they use.

On April 1, 1999, Great Plains Communications will implement intraLATA dialing parky/equal access. If you are interested in providing intraLATA equal access in any or all of the listed Great Plains Communications exchanges, please notify us in writing at the above address by January 31, 1999 and return the enclosed Atlachment A. Please indicate on the Atlachment which communities you wish to serve.

Sincerely,

Kathy Tripp Special Services Manager

Attachment: List of Exchanges

Date: December 8, 1998

To: Interexchange Carrier

From: Great Plains Communications

RE: IntraLATA Dialing Parity

On (refer to Attachment A), Great Plains Communications will implement IntraLATA Dialing Parity, a/k/a IntraLATA Equal Access. Customers will be given an opportunity to select a different long distance carrier for their intraLATA calls, but they will be advised that if they do not choose a different intraLATA provider, they will remain an intraLATA 1+ customer of U S WEST/Aliant.

After (refer to Attachment A), we will continue to offer U S WEST/Aliant as an intraLATA 1+ provider choice to new customers, along with other 1+ IntraLATA interexchange carriers. If you do not wish to continue to be an IntraLATA provider choice for Great Plains Communications customers, please notify us in writing by January 31, 1999 (see below).

US WEST/Aliant elects to continue to be an intraLATA toll provider for Great Plains Communications customers.

_	Yes
	No

Signature

Date

Contact Name: ______ Telephone Number: ______ Date

Dear Great Plains Communications Customer,

Currently U S West provides you with 1+long distance service within the North 402 and 308 calling area. This area is referred to as a local Access and Transport Area (LATA). (See attached map.) Great Plains Communications will be malking changes effective (Date) that will allow you to choose a different 1+ provider of long distance services within the LATA.

We will make no change in your service <u>unless</u> you tell us to do so. If you wish to choose a different long distance carrier for calls to points within your LATA, please fill out the enclosed response form and mail it to our office by (Date – 10 days prior to cutover).

You may want your 1+interLATA carrier to carry these intraLATA calls. Some of you may already be accessing your interLATA provider to handle intraLATA calls by dialing a 5 or 7 digit access code (1000X or 1010000). This conversion will allow you to access this carrier without dialing the access code. You may also select a different carrier altogether. Please note your choice on the enclosed form and send it to us.

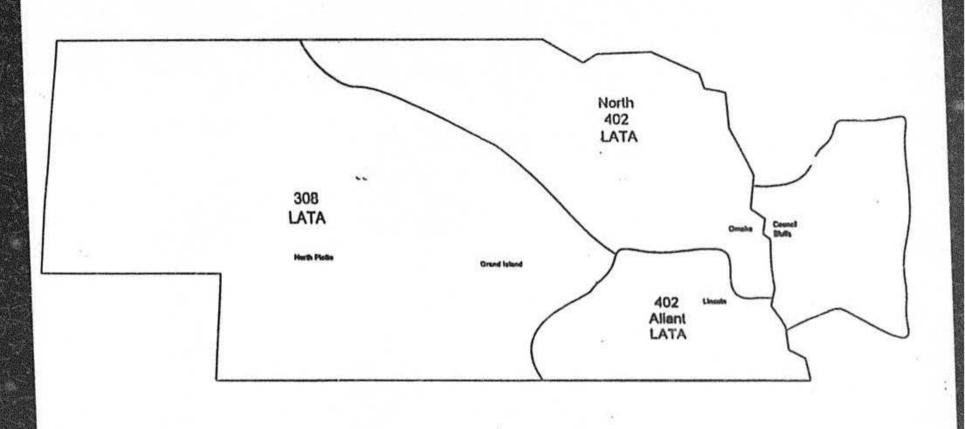
If you do nothing, U S WEST will remain your intraLATA long distance provider, just as it is today. Whether or not you make a choice now, there is a 90 day grace period during which time you may decide to change your intraLATA carrier at no charge. After (Date) you will incur a Primary Interexchange Carrier (PIC) change charge of \$5.00 for changing carriers.

Please call our Customer Response Center at 888-343-8014 if you have any questions on this matter.

Yours truly,

Kathy Tripp Special Services Manager

End.



* *

4.1

(Aliant LATA)

Dave

Dear Great Plains Communications Customer,

Currently Aliant provides you with 1+iong distance service within their 402 calling area. This area is referred to as a Local Access and Transport Area (LATA). (See attached map.) Great Plains Communications will be making changes effective (Cutover Date) that will allow you to choose a different 1+ provider of long distance services within the LATA.

Aliant has chosen not to be considered as an intraLATA provider option. Therefore, customers in the Aliant 402 LATA will be required to select a different long distance carrier for their intraLATA calls.

You may want your 1+interLATA carrier to carry these intraLATA calls. Some of you may already be accessing your interLATA provider to handle intraLATA calls by dialing a 5 or 7 digit access code (1000X or 1010000). This conversion will allow you to a cess this carrier without dialing the access code. You may also select a different carrier altogether. Please note your choice on the enclosed form and send it to us.

It is necessary that you complete the enclosed selection form and return it by (Response Form Due Date). If the form is not returned by this date, we may be required to allocate your intraLATA long distance service to a carrier that would not be the best choice to meet your needs.

Since Allant has decided not to participate as a long distance carrier in the future, they will be discontinuing the Optional Calling Plan to our customers. If you currently are enrolled in the plan, you will see a monthly charge of \$4.55 on your monthly telephone bill. The Optional Calling Plan will cease as of April 1, 1999.

You will be given 90 days after IntraLATA Equal Access implementation to change your intraLATA carrier at no charge. After (End of 90 day Grace Period), a PIC change charge of \$5.00 will apply to change your intraLATA toll provider.

Please call our Customer Response Center at 888-343-8014 if you have any questions on this matter.

Yours truly,

Kathy Tripp Special Services Manager

End.

(Aliant LATA)

INTRALATA CARRIER SELECTION CUSTOMER RESPONSE FORM

Telephone Number:

Name on Account:

I choose the carrier indicated below as my intraLATA carrier:

AT&T
 MCI
 Sprint
 Any Others (List all)

Signature

Date

NOTE: Ren unber, you must return this form if you wish to secure the intraLATA carrier of your choice.

(US WEST LATA)

INTRALATA CARRIER SELECTION CUSTOMER RESPONSE FORM

Telephone Number: _____

Name on Account:

I choose the carrier indicated below as my intraLATA carrier:

AT&T
 MCI
 Sprint
 Any Others (List all)

Signature

Date

NOTE: Remember, you do not need to return this form if you wish to retain your current intraLATA carrier. GREAT PLAINS COMMUNICATIONS, INC. BLAIF, MEBRASKA SERVICE CATALOG NO. 1 SECTION NO. 3 FIRST REVISED SHEET NO. 65

3.21.6 Coin Supervision Additive Service

The Company will provide Coin Supervision Additive Service to Payphone Service Providers who order local exchange service lines for the provision of pay telephone service and require central office coin supervision capability. Coin Supervision Additive Service provides the capability of central office line equipment to pass signals and/or tones for a local exchange service line to a trunk terminating at the Payphone Service Provider's operator service provider. The service allows the operator service provider to recognize coin deposits, return coins to users, and automatically ring back the originating line upon completion of a call. A monthly Coin Supervision Additive Service charge is assessed on a per line basis.

3.21.7 Presubacription

A. Presubscription is the process by which end user customers may select and designate to the Company an interexchange carrier to place, without any special codes, their interLATA and intraLATA calls.

B. An end user may select a primary interexchange carrier for all of its lines, or it may indicate a different interexchange carrier for each of its lines. Only one interLATA and intraLATA carrier may be selected for each line terminating in the same hunt group.

C. After the end user's initial selection of an interLATA and intraLATA carrier or the designation that they do not want to presubscribe to any interexchange carrier, the end user will be charged for any change in selection after conversion to Equal Access. This nonrecurring charge will be billed to the end user who is the subscriber to the Local Exchange Access Service. It is in addition to the interstate presubscription charge.

D. In the event the customer is incorrectly presubscribed, due to misassignment on the part of the Company, no charge shall apply.

E. In the event a customer is incorrectly presubscribed due to misassignment on the part of the interexchange carrier, and the interexchange carrier is unable to document such an assignment, the Company will apply the charge to the responsible interexchange carrier and assign the customer to an interexchange carrier of the customer's choice.

ISSUED: October 1, 1998 Effective: April 1, 1999

By: S. Michael Jensen, Vice President & General Manager Box 500, Blair, Nebraska 68008 (N)

(N)

GREAT PLAINS COMMUNICATIONS, INC. BLAIR, NEBRASKA

SERVICE CATALOG NO. 1 SECTION - CONTENTS SECOND REVISED SHEET NO. 10

Alphabetical Index (Continued)

Section - Sheet

π

L	
Liability of Company	2-21
Line Access Charges	4-1
Line Extensions	2-26, 4-19
Line Status	3-21
Link Up Mebraska	2-5
Long Distance	5-1
and a cance	3-1
м	
Mailbox Service	3-59, 4-18
Measured Service	3-3, 4-1
Minimum Contract Periods	2-7
Mobile Ecme Parks	2-27
*	
Nonpayment Reconnection Charge	3-24, 4-10
Number Change Intercept Service	3-61, 4-19
0	
Obligations of the Company	2-19
Obligations of Subscribers	2-23
Operator Services	3-20, 4-8
Outside Plant Construction	2-27
2	
Payment of Bills	2-10
Primary Listings	3-23
Triority of Service	2-20
Private Branch Exchange Service	3-61
Public Pay Stations	3-13, 4-5

(T)

ISSUED: October 1, 1998 EFFECTIVE: April 1, 1999

BY: S. Michael Jensen, Vice President & General Manager Box 500, Blair, Nebraska 68008

GREAT PLAINS COMMUNICATIONS, INC. BLAIR, HEBRASCA

SERVICE CATALOG NO. 1 SECTION - CONTENTS SECOND REVISED SHEET NO. 7

5-1

(T)

Table	of Cont	tents (Continued)	Section - Sheet
4.14	Emerger	moy Reporting Services	4-17
	4.14.1	30-Station Emergency Conference System	4-17
	4.14.2	911 Service	4-17
4.15	Voice B	tail Service	4-18
	4.15.1	Bulletin Board Service	4-18
	4.15.2	Mailbox Service	4-18
4.16	DID Ser	vioe	4-18
4.17	Miscell	aneous Services	4-19
	4.17.1	Special Billing Number Service	4-19
	4.17.2	Number Change Intercept	4-19
	4.17.3	Custom Number Service	4-19
	4.17.4	Joint User Service	4-19
	4.17.5	Construction and Line Extensions	4-19
	4.17.6	Fic Change Charge IntraLATA	4-19
Secti	on 5. L	ONG DISTANCE TELEPHONE SERVICE	
5.1	Rate Ap	plicability	5-1

5.2 Rates

ISSUED: October 1, 1998 EFFECTIVE: April 1, 1999

BT: S. Michael Jensen, Vice President & General Manager Box 500, Blair, Hebraska 68008

GREAT PLAINS COMMUNICATIONS, INC. BLAIR, MEERASKA

SERVICE CATALOG NO. 1 SECTION - CONTENTS FIRST REVISED SHEET NO. 5

Tabl	e of Con	tents (Continued) Se	ction - Sheet	t
3.17	Centra	s Service	3-36	
	3.17.1	General	3-36	
	3.17.2	Regulations and Conditions	3-46	
		Rate Application	3-48	
		Feature Availability	3-49	
3.18	Emerga	acy Reporting Services	3-52	
	3.18.1	Volunteer Firefighter and Rescue Squad Syste	ms 3-52	
		911 Service	3-52	
3.19	Voice M	il Service	3-58	
	3.19.1	Bulletin Board Service	3-58	
	3.19.2	Mailbox Service	3-59	
3.20	Direct	Inward Dialing	3-60	
	3.20.1	General	3-60	
	3.20.2	Rate Application	3-60	
3.21	Miscell	aneous Services	3-61	
	3.21.1	Private Branch Exchange Service	3-61	
	3.21.2	Special Billing Number Service	3-61	
	3.21.3	Number Change Intercept Service	3-61	
	3.21.4	Call Trapping	3-62	
	3.21.5	Custom Number Service	3-63	
	3.21.6	Joint User Service	3-64	
	3.21.7	Presubscription	3-65	

θ

ISSUED: October 1, 1998 EFFECTIVE: April 1, 1999

.

BY: S. Michael Jensen, Vice Freeident & General Manager Box 500, Blair, Nebraska 66008

GREAT PLAINS COMMERCICATIONS, INC. SERVICE CATALOG NO. 1 BLAIR, NEBRASKA SECTION NO. 4 SECOND FEVISED SHEET NO. 19 Baference 4.17 Miscellaneous Services 4.17.1 Special Billing Number Service 3.21.2 per number \$ 1.00/month 4.17.2 Number Change Intercept 3.21.3 Residence \$ 20.00/year Business 10 \$ 20.00/year 4.17.3 Custom Number Service 3.21.5 per number requested and provided \$ 75.00 4.17.4 Joint Usar Sarvice Monthly Rate 3.21.6 Schedule A Exchanges 1/2 the Business Rate Schedule B Exchanges \$ 6.00/line 4.17.5 Construction and Line Extensions 2.9 Milange charges, per 1/10 mile or fraction thereof from the measurest existing cable facility \$250.00 (billed in even saltiples of \$1.00) 6.17.6 Presubscribed Interexchange Carrier (Pic) Change Charge--\$ 5.00/line 3.21.7 (27) IntraLATA

ISSUED: October 1, 1998 EFFECTIVE: April 1, 1999

JY: S. Michael Jensen, Vice President & General Manager Box 500, Blair, Mabraska 68008-0500

ATTACHMENT A

Equal Access Timeline

Great Plains Communications

(All Exchanges are in Nebraska except as noted)

Customer Notification	Exchange	NP	NXX	Tandem	Customer Response Forms Due	Cutover Date	End of 90 day Grace Perind
2/15/99							
Tandem Sele Pinne circle des							
Lincoln	Byron	402	236	Lincoln	3/19/99	4/1/99	7/1/99
	Byron, South, KS	913	237	Lincoln	3/19/99	4/1/99	7/1/99
	Chester, South, KS	913	326	Lincoln	3/19/99	4/1/99	7/1/99
	Chester/Reynolds	402	324	Lincoln	3/19/99	4/1/99	7/1/99
	Deshier	402	365	Lincoln	3/19/99	4/1/99	7/1/99
	Red Cloud	402	746	Lincoln	3/19/99	4/1/99	7/1/99
	Red Cloud, South, KS	913	745	Lincoln	3/19/99	4/1/99	7/1/99
W1/99							
Tandena Selec Plane circle cheir							
Norfalk	Baacroft	402	648	Norfolic	4/2/99	4/15/99	7/15/99
	Beemer	402	528	Nonfolk	4/2/99	4/15/99	7/15/99
	Elgin	402	843	Norfolk	4/2/99	4/15/99	7/15/99
	Ewing	402	626	Norfolk	4/2/99	4/15/99	7/15/99
	Oakdale	402	776	Norfolk	4/2/99	4/15/99	7/15/99
	Page	402	338	Norfolk	4/2/99	4/15/99	7/15/99
	Petersburg.	402	386	Norfolik	4/2/99	4/15/99	7/15/99
	Ponce	402	755	Norfolk	4/2/99	4/15/99	7/15/99
	Wisner	402	529	Norfolk	4/2/99	4/15/99	7/15/99
Omaha	Dodge	402	693	Omaha	4/2/99	4/15/99	7/15/99
	Herman	402	456	Omaha	4/2/99	4/15/99	7/15/99
	North Bend	402	652	Omsha	4/2/99	4/15/99	7/15/99
	Scribner	402	664	Omaha	4/2/99	4/15/99	7/15/99
	Sayder	402	568	Omaha	4/2/99	U15/99	7/15/99

Page 1 of 3

Customer Notification	Exchange	NPA	NO	(Tandem	Customer Response Forms Date	Cutover Date	Ead of 90 da Grace Perio
3/15/99							
Tandesa Sele Plasse circle chei							
Grand Island	Calbertson	308	278	Grand Island	4/16/99	4/29/99	7/29/99
	Grant	308	352	Grand Island	4/16/99	4/29/99	7/29/99
	Hayes Center	308	286	Grand Island	4/16/99	4/29/99	7/29/99
	Huntley/Ragan	308	567	Grand Island	4/16/99	4/29/99	7/29/99
	Imperial	308	882	Grand Island	4/16/99	4/29/99	7/29/99
	Indianola	308	364	Grand Island	4/16/99	4/29/99	7/29/99
	Palisade	308	285	Grand Island	4/16/99	4/29/99	7/29/99
	Stration	308	276	Grand Island	4/16/99	4/29/99	7/29/99
	Trenton	308	334	Grand Island	4/16/99	4/29/99	7/29/99
	Venango	308	447	Grand Island	4/16/99	4/29/99	7/29/99
	Venaugo, West, CO	303	448	Grand Island	4/16/99	4/29/99	7/29/99
	Wilcox	308	478	Grand Island	4/16/99	4/29/99	7/29/99
77/99							
Fandem Select Finns sinds choice							
Grand Island	Archer	308	795	Grand Island	4/23/99	5/6/99	8/6/99
	Arnold	308	848	Grand Island	4/23/99	5/6/99	8/6/79
	Belgrade	308	357	Grand Island	4/23/99	5/6/99	8/6/99
	Calleway	308	836	Grand Island	4/23/99	5/6/99	8/6/99
	Cedar Rapids	308	358	Grand Island	4/23/99	5/6/99	8/6/99
	Chapman	308	986	Grand Island	4/22 79	5/6/99	8/6/99
	Cotesfield	308	968	Grand Island	4/23/99	5/6/99	8/6/99
	Oconto	308	858	Grand Island	4/23/99	5/6/99	8/6/99
	Printrose	308	396	Grand Island	4/23/99	5/6/99	8/6/99
	Spaiding	308	497	Grand Island	4/23/99	5/6/99	8/6/99
	Stapleton	308	536	Grand Island	4/23/99	5/6/99	8/6/99
	Sutherland	308	186	Grand Island	4/23/99	5/6/99	8/6/99
	Tryon	308 5	87	Grand Island	4/23/99	5/6/99	8/6/99

Tuesday, September 22, 1998

hgs1of3

H ber 22, 1998

No Jal

																Norfalk	Tandem Schertien Fam dets daim(s)	(SIM)					
Wynot	Wood Lake	Wissetoon	Water	Walnut	Vadigre	Nicheara	Kilgorn, North, SD	Kilgove	Croalation, North, SC	Croakston	Cruthom	Creighton	Cody, Nanth, SD	Cady	Cennter	Etoomfield	sine(s)		Runhville	Minage Flats	Merrisona	Hay Springs	
402	402	402	402	ŝ	102	102	605	402	605	402	102	402	605	台	402	5			X	SOC	308	305	
357	267	\$47	200	655	668	857	969	8	8	8	X	358	8	8	2383	373			327		684		
Norfolk	Norfalk	Norfolik	Norfalk	Norfalk	Norfalic	Northlic	Norfolk	Norfolk	Northik	Northlic	Norfalk	Norfblic	Norfalk	Northilt	Norfolk	Norfolk			Sidney	Sidney	Sidney	Sidney	
5/7/99	5/1/99	5/7/99	SILIDO	5/7/99	5/1199	SULUS	5/7/99	5/7/99	5/1/99	5/1/99	SULIS	SULLA	SULLA	5/7/99	5/7/99	SALINS			4/30/99	4/30/99	4/30/99	4/30/99	
5/20/99	5/20/99	5/20/99	\$120199	\$120/99	\$/20/99	\$/20/99	\$120199	5/20/99	5/20/99	\$120/99	\$120/99	\$120199	5/20/99	SIZONAD	5/20/99	\$120169			SVLLVS9	SUTUR	5/1399	SUIVE	
8/20/99	8/20/99	8/20/99	8/20/99	\$/20/99	8/20/99	8/20/99	8/20/99	8/20/99	8/20/99	8/20/99	8/20/99	\$120/99	8/20/99	8/20/99	8/20/99	8/20/99			SACINE	8/13/9	8/13/9	\$1137	

.

2

Runhville	Minage Flats	Merrisona	Hay Springs	Gordan, North, SD	Gordon
XOR	SOC	XOR	305	605	Soc
727	232	634	638	288	282
Sidney	Sidney	Sidney	Sidney	Sidney	Sidney
4/30/99	4/30/99	4/30/99	4/30/99	4/30/99	4/30/99
\$113/59	SUIVE	SALING	SUTUR	SULTUS	SILV99
8/13/99	8/13/99	8/13/99	\$11399	8/13/99	\$113/99

NIN C

Omad Island

St. Edward

402 678 308 246 NDV VAN

4/23/99 4/23/99

546792 516499 F

8/6/99 8/6/99

Grand Island Omt

ქ

P

ner Be

Cutaver

Ead of 90 day Grace Period

Farmel

Tandez Passes

a Selection

ŝ

Sidery

2

Exchange Wolbach

ATTACHMENT B

COST RECOVERY FOR INTRALATA DIALING PARITY

Great Plains Communications does not plan to apply the Commission-approved surcharge to originating intraLATA access minutes for the allowable three-year period. Instead, Great Plains Communications will book the costs of implementing intraLATA dialing parity in the appropriate operating expense account.

SDITC

South Dakota Independent Telephone Coalition, Inc.

Richard D. Colt Executive Director restingut-cybrace.en

May 17, 1999

Bill Bullard, Executive Director South Dakota Public Utilities Commission State Capitol Building 500 East Capitol Building Pierre, South Dakota 57501

RECEIVED

MAY 1 7 1999 SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

RE: Dockets 14, 300 Nr, TC99-043, YC99-046 and TC99-047 (Implementation Plans for IntraLATA Dialing Parity)

Dear Bill:

SDITC submits this letter on behalf of its member LECs that have recently filed IntraLATA Dialing Parity Plans (hereinafter referred to as "Implementation Plans") for Commission approval. This includes the following local exchange carriers (LECs):

> Accent Communications, Inc. Splitrock Properties, Inc. Jefferson Telephone Company Venture Communications, Inc. Hanson County Telephone Company Hanson Communications, Inc. Vivian Telephone Company Stockholm-Strandburg Telephone Co. Heartland Communications, Inc. Mobridge Telecommunications West River Telecommunications Cooperative Stateline Telecommunications, Inc. Kennebec Telephone Company Western Telephone Company Beresford Municipal Telephone Company

Specifically, this letter is filed in response to Staff comments dated May 7, 1999, filed in the above referenced Dockets.

All of the SDITC member companies that have filed "Implementation Plans" with the Commission concur with the Staff comments and offer to amend their Implementation Plans in accord with the Staff recommendations.



207 E. Capital Ave., Ste. 206 @ P.O. Box 57 @ Pierre, SD 57501 @ Ph: 605/224-7629 @ Fax 605/224-1637

Staff first recommends that the language in the proposed "customer notification letter" (Appendix C) be amended to state that if the customer chooses to change intraLATA long distance carriers, the customer should directly contact the long distance company that he/she has chosen in order to initiate that change. The SDITC member LECs share Staff's concerns and also believe customers would be better served by contacting the long distance carrier selected if they wish to make a change in their IntraLATA long distance service. This will ensure (1) that consumers receive applicable rate information prior to making their carrier selection; and (2) that any preferred carrier change order is properly verified consistent with the FCC rules addressing changes in preferred telecommunications service providers (47 C.F.R. §§ 64.1150, 64.1160, and 64.1100).

Staff further notes that none of the SDITC member LECs, other than Kennebec Telephone Company, have indicated how payphone station lines will be treated in the IntraLATA dialing parity conversion process. The SDITC member LECs agree with Staff, that payphone lines should also be addressed.

In response to the Staff concerns, each of the SDITC member companies affected offers to revise its Implementation Plan (by revising Sections 5 & 6 of the Plan and Appendix C, the customer notification letter) as set forth below. To illustrate these proposed revisions, the Stateline Telecommunications, Inc. Plan is used as an example.

Revise Section 5 of the Plan as follows:

5. Interexchange carrier "carrier" notification.

All carriers certified in South Dakota to provide long distance services will be notified by June 1, 1999, of the conversion to intraLATA toll dialing parity (a sample copy of the carrier notification letter to be used is attached hereto as Appendix A). These carriers will be asked to respond by June 16, 1999, if they want to participate in the intraLATA toll presubscription process (a sample copy of the form which carriers will complete to indicate their participation in the presubscription process is attached hereto as Appendix B). For those eCarriers that choose to participate in the presubscription process, shall submit verified preferred carrier change orders to Stateline Telecommunications, Inc. to effectuate requests by subscribers for their intraLATA toll service information regarding customer choices will be forwarded by the local exchange carrier to the participating carriers through the "Customer Account Record Exchange" ("CARS") process in place today for exchanging information regarding interLATA toll selections. The CARE process allows for regular reporting via magnetic tape or facsimile transmission of customer carrier selections between local-exchange carriers and long distance carriers.

Stateline Telecommunications, Inc. will also provide a summary report that will list all-carrier selections received for the long distance carrier for whom the report is prepared. This report will be mailed to each participating long distance carrier in advance of the intraLATA dialing parity implementation date. Stateline Telecommunications, Inc. will make available preconversion customer name and address lists. These customer lists are available to assist participating carriers in their presubscription solicitation efforts. These lists may be provided subject to a reasonable non-discriminatory fee, with delivery contingent upon the carrier meeting all requirements for participation in the intraLATA presubscription process.

Revise Section 6 A of the Plan as follows:

6. Customer notification.

A. Current customers.

Customers, including payphone service providers, will be notified of the conversion to intraLATA toll dialing parity by letter postmarked by no later than June 25, 1999. In such letter, customers will be advised of their intraLATA choices. Customers will be given the option to remain with their existing intraLATA 1+ carrier, Express Communications, or to choose a different intraLATA carrier for their 1+ service. The letter will include a list indicating all carriers in addition to the existing 1+ carrier that have chosen to participate in the intraLATA toll presubscription process (a sample copy of the customer notification letter that will be used is attached hereto as Appendix C).

Stateline Telecommunications. Inc. will include with the customernotification letter a customer response form (a sample copy of the customer response form to be used is attached hereto as Appendix D). Customers will be advised that if they choose a carrier other than their existing intraLATA 1+ carrier, they must fill out and return the response form postmarked by July 12; 1999 directly contact the long distance company that they've chosen in order to initiate that change. Those customers choosing to stay with their existing intraLATA 1+ carrier, will not have to return the response form take any action. Their intraLATA 1+ service will remain with their current provider. Based on the customer response forms received and any letters of agency received directly from participating carriers, Stateline Telecommunications, Inc., as of the date and time that intraLATA dialing parity is implemented, will execute all neccessary carrier selection changes.

Customers will not be charged for making any change to their intraLATA 1+ carrier during the presubscription process. In addition, customers will be advised that they will be given 60 days after the intraLATA toli dialing parity implementation date to change their intraLATA 1+ carrier at no charge. Revise the customer notification letter (Appendix C) as follows:

To: All Customers of

Stateline Telecommunications, Inc.

Stateline Telecommunications, Inc. is pleased to announce that effective July 22, 1999, we will make it possible for you to choose from various long distance companies for your in-state 1+ long distance service (intraLATA long distance service). This service includes all of your intrastate long distance calls made by dialing 1 plus the area code and local telephone number. With these changes, you will have the ability to select a long distance company for your in-state 1+ long distance service.

In conjunction with making these changes, Stateline Telecommunications, Inc. is asking all of its local exchange subscribers to choose whether they wish to retain the current long distance company providing their in-state 1+ long distance service or select another company for the service.

Currently, Express Communications provides your in-state 1+ long distance service. This company will continue to provide service to you unless you tell us to make a change and select another carrier. If you do nothing, your in-state 1+ long distance service will remain with Express Communications.

Attached is a list of long distance companies, in addition to Express Communications, that have agreed to provide 1+ in-state long distance services in your area. If you would-like one of these other companies to provide your service, please complete the customer response form that is also attached and return it to our business office postmarked by no later than July 12, 1999 with to change your 1+ in-state (intraLATA) long distance carrier, you must directly contact the long distance company that you've chosen in order to initiate that change.

You will not be charged for making a change to your existing in-state 1+ long distance service in response to this notice. In a 'dition, for a period of 60 days after July 22, 1999, you may decide to change your in-state 1+ long distance carrier, one time, at no charge. After September 20, 1999, you will incur a Primary Interexchange Carrier (PIC) charge of \$5.00 for changing carriers.

Please call our office at 605-244-5236 if you have any questions on this matter.

Sincerely,

Darrell D. Henderson, General Manager

Revise the "List" of participating long distance carriers attached to the customer notification letter as follows:

LIST

Listed below are the other long distance companies that are willing to offer you intraLATA 1+ (generally in-state) long distance services. If you wish to change your intraLATA 1+ long distance carrier, please complete the attached form and return it postmarked by July 12, 1999, to Stateline Telecommunications, Inc. P.O. Box 39, Bison, South-Dakota 57620 directly contact the long distance company that you've chosen in order to initiate that change.

ABC Telephone Company, Inc. Bus/Res: 1-800-555-1234

LMNOP Telecommunications Bus: 1-800-55-2345

ZXC Telephone Company Bus/Res: 1-800-555-3456

3.

Additionally, in accord with the Staff recommendations, each company proposes to remove completely from its Plan the "Customer Response Form" (Appendix D). This form would obviously not be necessary if customers are asked to directly contact their chosen long distance carrier.

I should further note that regarding the Staff recommendations seeking minor revisions to the customer notification letters proposed by Heartland Communications, Inc. and Accent Communications, Inc., these companies will revise their plans further to address these additional recommendations.

The SDITC member LECs will file revised Implementation Plans incorporating the above revisions, provided these revisions are found acceptable to the Commission.

Sincerely,

rd D.

Executive Director



RECEIVED

VIA FACSIMILE AND OVERNIGHT MAIL

May 17, 1999

William Bullard, Jr. Executive Director South Dakota Public Utilities Commission Capitol Building, 1st Floor 500 East Capitol Avenue Pierre, SD 57501-5070

MAY 1 8 1999

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

FAX Received MAY 17 1999

RE: Revised Dialing Parity Plan

Dear Mr. Bullard,

HEADQUARTERS PO. Box 66 29705 453" Avenue Inere, Southe Dweeter 57037-0066

605.263.3301 800.239.7501 Fax 605.263.3995

www.stg.com

Enclosed is a copy of the revised dialing parity plan and revised Exhibits B and C to comply with the comments of Commission Staff regarding DTG's initial filing. Also enclosed is Exhibit D, which was under development at the time the original plan was submitted. A disk with the revised plan and all Exhibits is also inclosed.

Please contact me if there are any questions. Thank you.

Sincerely,

aston Corporate Counsel

RECEIVED

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF SOUTH DAKOTA

MAY 1 8 1953

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

TC99-030

IN THE MATTER OF THE FCC ORDER ESTABLISHING NEW DEADLINES FOR IMPLEMENTATION OF INTRALATA DIALING PARITY BY LOCAL EXCHANGE CARRIERS.

REVISED IntraLATA Dialing Parity Plan Dakota Telecommunications Group, Inc. (DTG) DTG Community Telephone, Inc. (DCT) Dakota Telecom, Inc. (DTI)

Pursuant to federal directive (FCC 99-54, in CC Docket No. 96-98 (released March 23, 1999)) and the Commission guidance in this docket, DTG, in conjunction with it local exchange service subsidiaries, DCT and DTI (collectively referred to as "DTG"), submits the following plan to implement intraLATA dialing parity on July 22, 1999:

 No later than May 28, 1999, DTG will send the notice attached as Exhibit A to all interexchange carriers (IXC) registered with the Commission informing them that DTG is capable of providing an intraLATA presubscribed, primary interexchange carrier (PIC) selection to its local exchange service customers.

2. The IXCs will have until June 15, 1999, to file an access service request (ASR) for intrastate Feature Group D (FGD) to be included in the presubscription customer notification process. If the IXC is already purchasing interstate FGD, and no intrastate FGD ASR is received by June 15, 1999, DTG will assume that the IXC wishes to purchase intrastate FGD and the IXC will be included as one of the PIC carriers in the customer notification letter. If an IXC submits an ASR for FGD after the 15th, the IXC will not be included in the notification, but will be one of the PICs available to a customer from DTG's customer service representatives upon request.

 On or before June 23, 1999, a letter will be sent to all DTG local exchange service customers notifying them of the initiation of presubscribed intraLATA dialing parity. A copy of that form letter is at Exhibit B.

4. Carriers who have obtained new customers through this process will initiate the PIC by returning a properly completed LOA, or other evidence of customer selection, which complies with federal and state law. The customer will be assigned to the selected IXC beginning July 22, 1999. Where there is no documentation of a PIC change the customer will be assigned the PIC code of their existing intrastate carrier. This procedure will ensure uninterrupted intrastate long distance access by dialing "1" (605) plus the remaining seven digits. IntraLATA dialing parity will be provided for the South Dakota LATA. Dialing parity will be provided for all local exchange service customers and all public access lines.

6. Any request for a change of a PIC will be accomplished with the provision of a properly completed LOA, or confirmation of the PIC change, as required by federal regulation and the recently enacted Senate Bill 238. Because of the change in federal regulation and state law, DTG is revised its customer service procedures to reflect those changes. The revised procedures are Exhibit D to this plan.

This revised plan is submitted this 13th day of May, 1999.

William P. Heaston Barbara E. Berkenpas Dakota Telecommunications Group, Inc. P.O. Box 66 Irene, SD 57037-0066

REVISED EXAMPLE

Exhibit B

Date

TO: All Local Exchange Customers

Effective July 22, 1999, DTG will be able to provide presubscribed intrastate, intraLATA dialing parity to you as a local exchange customer. In plain language, the term "presubscribed" means that your in-state long distance calls will always be carried by your chosen carrier when you dial the number "1" (605) plus the seven digit number. Your presubscribed in-state carrier is commonly known as your primary carrier or your PIC. This letter does not require you to change your existing in-state long distance provider if you do not want to make a change. If you currently have a block on your in-state long distance service, you do not need to respond to this letter.

Because of concerns with customers being switched to long distance providers without their consent, a practice called "slamming," federal and state law now requires that you make an affirmative choice of your in-state carrier. The best way to do this is for you to contact the long distance carrier of your choice so that carrier can obtain a letter of agency (LOA), if required, or take other action to comply with federal and state law. You must make this choice so that the carrier of your choice can communicate that choice to DTG **BEFORE JULY 15, 1999.** If you have more than one local exchange number, you will have to designate your PIC for each number. If you do not want to change your existing in-state long distance provider, you should do nothing. You need not respond to this letter. You need not contact your existing in-state long distance carrier.

Attached is a list of carriers that have told DTG that they are available for selection as your PIC for in-state service. If you do change your carrier, you will need to contact that carrier to initiate the change. There is no charge for changing your carrier at this time. There also will be no charge for a one-time change made during the 60-day period after July 22, 1999. Changes made after the 60-day period will be subject to a charge.

If you have any questions, please call our customer service department at 263-3301 or (800) 239-7501.

Sincerely,

Vhonda Miller

REVISED EXAMPLE

Exhibit C

List of Available Primary In-State Long Distance Service Carriers

Exhibit D

ILEC Service Verification Procedures

Effective Date: July 22, 1999. Pre-subscribed Intrastate dialing parity will be available.

Office Procedures-

ILEC: New Customers

- Local Exchange Service: If a customer chooses a CLEC's service, DTG service will be terminated when the CLEC provides verification (using an LOA or third party verification). The CSR will facilitate the switch to the CLEC to insure the customer does not lose local service dial tone for any appreciable period.
- Intrastate LD Service: Will be provisioned after July 22, 1999.
- If the customer chooses to wait until the LD can be provisioned, the customer will not receive intrastate long distance until an LOA is signed and provided to the customer's PIC, or the PIC performs the necessary third party verification. The customer's service order will stay in "S" status until the LOA is received. Once notification is received from the PIC that it has the necessary verification (i.e.LOA or third party), the CSR will go into the comment section of the service order, enter the verification information (PIC name, code, verification type), and bump the order on to dispatch status. If the PIC is DTG, the LOA will be filed in the customer's file.
- If the customer chooses to have local dial tone immediately without long distance, the order will be bumped through to dispatch for provisioning awaiting the necessary verification. Once verification is received, the CSR will initiate the IDE PIC change service order to provision the intrastate long distance, including the PIC name, code and verification type. If the PIC is DTG, the LOA will be filed in the customer's file.
- Interstate LD Service: Currently being provisioned. Same process as for Intrastate LD service

Additional Lines- (Verification's are notated on screen 6 in Commsoft)

- If the PICs are the same, only one verification is needed, and would be on the main line. Notate the
 additional lines phone numbers and the date of installation on the verification record.
- If the PICs are different for 1st and 2nd lines, verification is necessary for each line. The LD on the
 additional lines will be the same as the main line until verification is received requesting different
 Intrastate and/or Interstate carriers.

Forms needed:

Verification from CLEC or PIC and mark the appropriate blanks on the New Customer Service Order form.

New Customer Packets:

LOAs to be added as needed. Also insert the Low Income Assistance Information.

Public Access Lines: Payphone owners are provided local dial tone and long distance service in the same manner as business and residential service customers.

CLEC Service Verification Procedures

Effective Date: July 22, 1999. Pre-subscribed Intrastate dialing parity will be available.

Office Procedures

DTG does not do independent third party verification.

CLEC: New Customers- complete all three LOAs

- Local LOA: Required for a new CLEC customer per federal and state legal requirements. A majority of
 the CLEC customers will complete their LOAs with the sales staff upon subscribing. If a new LOA with
 current date is required for the new phone number/location, the CSR staff will send an installer or sales
 staff person to the location and have it signed. The LOA is needed for a reconnect if a customer switches
 back to DTG from another local phone company.
- Intrastate Service: Provisioned after July 22, 1999. Where the customer does not wish to change the
 intrastate LD provider, no LOA is necessary. If the customer wishes to pick DTG as its intrastate LD
 carrier, the appropriate LOA will either be completed by the sales staff at the time of the sale or:
 - If there is a premise visit, the installer will have the LOA completed.
 - If there is no premise visit, the CSR can mail or fax the LOA form to the customer.
 - The customer will not receive intrastate LD until the LOA is signed and returned. The customer's
 service order will stay in "S" status until the LOA is received. Once the LOA is received, the CSR
 will then go into the comment section of the service order, enter the LOA information (PIC name and
 code), and bump the order on to dispatch status. The LOA will be filed in the customer's file.
 - If the customer chooses to have local dial tone immediately without LD, the order will be bumped through to dispatch for provisioning and wait for the LOA. Once the LOA is received, the CSR will initiate the CDE PIC change service order to provision the intrastate long distance, including the PIC name and code, at d file the LOA in the customer's file.
 - Interstate Service: Same procedure as above for intrastate service

Additional Lines- (LOA's are notated on screen 6)

- If the PICs are the same, only one Local, Intrastate and Interstate LOA is needed, and would be on the main line. Notate the additional lines phone numbers and the date of installation on the original LOA.
- If the PICs are different for 1st and 2nd lines, the customer would complete Intrastate and Interstate LOA's for the 2nd line. The LD on the additional lines will be the same as the main line until an LOA is received requesting different Intrastate and/or Interstate carriers.

Forms needed:

Local LOA, Intrastate LOA, and Interstate LOA forms, and mark the appropriate blanks on the New Customer Service Order form.

New Customer Packets:

LOAs to be added as needed.

Public Access Lines: Payphone owners are provided local dial tone and long distance service in the same manner as business and residential service customers.

Verification Procedures - LD PIC Change Only

ILEC and CLEC: PIC change requested by an existing customer

Intrastate and/or Interstate- (Local service not changing)

- Access the customer service record to determine if the customer has a PIC freeze, code 5 under PIC column, before proceeding.
- If there is a PIC freeze, it will need to be removed before any change can be implemented. The customer
 will be mailed a PIC freeze release form to sign and return, marked to remove freeze, before the freeze
 can be removed. At customer request, the CSR will participate in a three-way-call verification process in
 lieu of the mailing and signing of the PIC freeze release form. If a three-way-call is conducted, the
 customer service record will be sufficiently annotated to identify the customer and the person and the LD
 carrier seeking the PIC change so that any dispute can be resolved using the information in that record.
- If the LD Carrier has submitted the necessary PIC change verification information, dated after the release
 of the freeze, the PIC change will be implemented.

1. Switching to DTG

- · Mail brochure that includes Intrastate, Interstate, Travel card, and 800# requests.
- Once brochure is received back from the customer with signature, the CSR staff will provision the long distance service, travel card request, and 800# request.
- This form can be used for current ILEC or CLEC customers.
- Long distance service will be activated approximately 2-3 days after receiving the signed LOA form in the Sioux Falls office.
- Information is loaded into the customer's account record Information codes, screen 6.

2. Switching to another LD carrier-

- The customer will be advised to contact the carrier of their choice to request that LD service. CSRs will not do PIC changes based only on a customer's verbal request. To facilitate the change for the customer, the CSR may provide the 800# for the LD carrier, if known.
- When the gaining LD carrier contacts the DTG office by fax or other method capable of saving a record of the contact - The verification field will be completed. The gaining LD carrier is responsible for maintaining the actual verification record. The CSR will follow through with the DE PIC change order requesting the LD PIC change. The verified choice will be tracked in the billing system - Information Code screen 6. A copy of the fax will be placed in on the customer's file for verification.

U S WEST, Inc. 1801 California Street, Suite 5100 Denver, Colorado 80202 303 672-2785 Facelinite 303 298-6187

Todd L. Lundy Senior Alumey

VIA FEDERAL EXPRESS



RECEIVED

MAY 1 8 1999

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

Mr. William Bullard, Jr. Executive Director South Dakota Public Utilities Commission 50 J East Capitol Avenue Pierre, SD 57501

FAX Received WAY 17 B

RE: In the Matter of the FCC Order Establishing New Deadlines for Implementation of Intralata Dialing Parity by Local Exchange Carriers, Docket No. TC 99-030

Dear Mr. Bullard:

Enclosed for filing are an original and ten (10) copies of U S WEST's Rebuttal Comments on AT&T's Dialing Parity Implementation Plan. This document was filed via fax on this date, as well as electronically.

Please return a file-stamped copy of the pleading in the enclosed self-addressed stamped envelope. Thank you for your cooperation.

Sincerely,

May 17, 1999

Toda Lundy / no

Todd Lundy

Enclosures



RECEIVED

MAY , 8 1999

BEFORE THE PUBLIC UTILITIES COMMISSION OUTH DAKOTA PUBLIC OF THE STATE OF SOUTH DAKOTA FAX Received MAY 12

IN THE MATTER OF THE FCC ORDER ESTABLISHING NEW DEADLINES FOR IMPLEMENTATION OF INTRALATA DIALING PARITY BY LOCAL EXCHANGE CARRIERS TC 99-030

U S WEST'S REBUTTAL COMMENTS

U S WEST Communications, Inc. (U S WEST), through counsel, submits its rebuttal comments to the Commission Staff's Comments, the Joint Comments of AT&T Communications of the Midwest, Inc., MCI Telecommunications Corporation, and MCIWorldCom, Inc. (collectively AT&T's Comments), and the Comments of Sprint Communications Company L.P.

Waiver for the McIntosh, Timber Lake, and Morristown Exchanges

The Commission Staff has raised the issue of U S WEST's request for a temporary waiver for the McIntosh, Timber Lake, and Morristown exchanges within South Dakota. This waiver affects three wire centers and less than one thousand access lines. These exchanges are the subject of a 1994 sale from U S WEST to the Telephone Authority, organized under the authority of the Cheyenne River Sioux Tribe. This sale, combined with the legal environment and the technical unfeasibility of converting these switches to dialing parity, have required U S WEST to request a waiver from this Commission, as well as the FCC.

U S WEST attaches as Exhibit 1 its "Petition for Waiver of U S WEST Communications, Inc.," filed with the FCC. U S WEST incorporates its Petition as a comprehensive explanation of the circumstances surrounding U S WEST's request for a temporary waiver.

After the sale of these exchanges to the Telephone Authority in 1994, extensive litigation ensued over the jurisdictional questions raised by the sale. The Commission has reviewed the sale twice, once initially, and again after the Circuit Court for Hughes County remanded the n atter to the Commission for reconsideration. The Circuit Court reviewed the matter a second time and upheld the Commission's denial of the sale. The case is currently before the South Dakota Supreme Court. Further, the parties have engaged in extensive negotiations in an attempt to resolve these issues out-of-court.

U S WEST is certainly an affected party by these proceedings; however, the fundamental dispute concerns the relative jurisdictional authority of the South Dakota Commission and the tribal Telephone Authority. Because of the sale, and the uncertainty over approval of the transfer of the exchanges, U S WEST did not anticipate shouldering the ownership responsibilities of the affected exchanges.

In addition, the South Dakota statutes did not require U S WEST to implement dialing parity until it also received authority to provide interLATA services. See SDLC § 49-31-87. This statute, coupled with the Eight Circuit's ruling vacating the FCC's dialing parity rules requiring implementation by February 8, 1999, relieved U S WEST from implementing dialing parity for the three exchanges affected by the sale to the Telephone Authority.

Further, the switching equipment for these exchanges were not capable of implementing dialing parity, and U S WEST did not schedule an upgrade of this equipment due to the pending sale. Because of the FCC's and this Commission's orders requiring dialing parity by July 22, 1999, U S WEST has ordered equipment for these three exchanges that can accommodate dialing parity. The new equipment probably will not be installed unt¹¹ late August, 1999. The conversion and testing will take a number of months as well. U S WEST must also test the new equipment for Year 2000 compliance. As stated by the FCC, "technical problems caused by purely exogenous circumstances may constitute special circumstances that would justify the granting of a waiver in the public interest." Implementation of the Local Competition Provisions

of the Telecommunications Act of 1996, Petition of Southwestern Bell Telephone Company, Pacific Bell, and Nevada Bell for Expedited Declaratory Ruling on Interstate IntraLATA Toll Dialing Parity or, in the Alternative, Various Other Relief, Order, CC Docket No. 96-98, NSD File No. L-98-121, FCC 99-781 (rel. Apr. 22, 1999) ¶ 12.

For these reasons, U S WEST requests a temporary waiver for the implementation of dialing parity for the McIntosh, Timber Lake, and Morristown exchanges until December 31, 1999. U S WEST will implement dialing parity for all of its other exchanges by July 22, 1999.

Pursuant to the Staff's request, U S WEST attaches as Exhibit 2 a list of all South Dakota NPA/NXX combinations in U S WEST's area. Dialing parity will be implemented on July 22, 1999 for all listed exchanges except for McIntosh, Timber Lake, and Morristown.

Customer Notification

U S WEST's proposed customer notice meets Commission requirements relative to competitive neutrality. It advises South Dako a customers of the forthcoming implementation of 1 + intraLATA toll dialing parity and provides information allowing end users to change to an alternative provider. The proposed notice is competitively neutral and does not refer to marketing of any sort. It is written in clear, concise, and understandable language.

AT&T's comments address the format of the notice, and say:

The commission should clarify that the mailings should be a separate letter written on neutral letterhead and sent via first class mail, not a bill insert. Allowing the letter to be included with any other information or to be delivered in any other fashion increases the likelihood that customers will perceive the notice to be 'junk mail' and discard it without realizing the important choice that is now available.

U S WEST has provided customer notices in many states through a bill insert. In fact, research would show that notice of this type would receive a higher degree of readership than a separate mailing. However, due to the short time interval expected (thirty days) from plan approval to the scheduled implementation date, utilizing the bill insert method is not feasible.

U S WEST will provide customer notice in South Dakota by means of a separate first class mailing. U S WEST is unsure what AT&T means when it requests that notice be provided on "neutral letterhead." Assuming that AT&T is referring to stationary void of logo or corporate sponsorship, such mailings were ordered by both the Minnesota and Arizona Commissions; however, the backlash of calls received in U S WEST's call centers due to customer confusion was astronomical. Customer notice provided as a separate mailing that identifies U S WEST as the sponsoring corporation was approved in other states and deemed adequate. Thus, U S WEST proposes to provide notice using U S WEST envelopes and letterhead. Otherwise, the recipient may be uncertain of the sender, which increases the likelihood that the customer will indeed see this notification as "junk mail" and discard it prior to reading.

AT&T's comments regarding competitive neutrality are ironic, at best, considering its own proposed notice. AT&T's comments say: "The sheer number of times that U S WEST's name appears in the customer notification letter precludes the letter from attaining its goal of competitive neutrality." In comparison, AT&T's proposed customer notification letter (Exhibit 2 of AT&T's Request for Approval of Dialing Parity Implementation Plan) attempts to dissuade their customers from selecting any provider other than AT&T. It says: "As a valued AT&T Digital Link customer we are pleased to announce an enhancement to your AT&T Digital Link service." Not only does this language not meet this Commission's requirement for competitive neutrality, but also it appears that AT&T chooses to take credit for the concept of toll dialing parity when in ft ct it is a requirement of the FCC. The notice provided by AT&T goes on to instill uncertainty in the customer's mind by including such fear-inducing statements as "changing long distance carriers could affect your volume discount structure" and encourages

astomers to "contact AT&T for details as to the effect switching long distance companies would have on their discount structure." AT&T's notice closes with a gracious "As always, we are grateful for your continued business." U S WEST's notice should be considered neutral in comparison to the obvious marketing tactics that AT&T wants to utilize.

Business Practices for New Customers

Both the Staff and AT&T have questioned U S WEST's plan regarding how it interacts with customers when they call U S WEST for new service. The Staff says that, if a customer requests information from U S WEST as to its toll products and services, then the customer should be transferred to another sales representative. AT&T summarizes, inaccurately, the first amendment litigation pending in federal court in Montana regarding the script imposed by the Montana Commission. AT&T also fails to mention the numerous state commissions that have authorized U S WEST to make the same limited statements that are contained in U S WEST's South Dakota plan.

As shown below, U S WEST's plan for handling calls initiated by customers incorporates the rulings of other state commissions and as well as the federal court's ruling in the Montana first amendment case. U S WEST's plan says:

If the customer is uncertain, U S WEST will read from a random list. Customers will be advised that U S WEST is a choice. Should the customer request information relative to U S WEST toll products and services, U S WEST will respond to the customer's request. Customers will be asked for their selection.

The first issue is whether U S WEST may tell customers that it is a provider of intraLATA services. The state commissions for Arizona, Colorado, Nebraska, Iowa, Wyoming, Utah, Oregon, Washington, and Minnesota all authorized U S WEST to inform customers that U S WEST is one of the companies that provides intraLATA services. U S WEST's South

Dakota plan is consistent with these rulings from other state commissions within U S WEST's fourteen-state region.

The FCC's ruling in <u>Application of BellSouth</u>, 13 FCC Rcd 539, ¶ 233,236-37 (1997), also supports U S WEST's ability to identify itself as a provider. In that docket, the FCC affirmed BellSouth's "right" to affirmatively recommend its affiliate interLATA provider to custon ers, as long as customers were aware that they had a choice of providers. U S WEST's identification of itself as a provider is far less promotional than Bell South's "recommendation" of itself.

The second issue, raised by the Staff and AT&T, is whether U S WEST may answer questions posed by its customers without first transferring the call. This issue was addressed by the federal court in Montana and the Montana Commission, with the end result being that U S WEST must be allowed to answer questions posed by its customers; otherwise, the first amendment rights of U S WEST and consumers would be violated.

In Montana, the state Commission issued an order imposing scripting requirements upon U S WEST. This order appeared to prohibit U S WEST from disseminating any information to its customers about its services, including the answering of questions posed by its customers. U S WEST filed an action with the federal district court in Montana, seeking a preliminary injunction to suspend such restrictions on the basis of the first amendment. Before the court ruled on U S WEST's motion for a preliminary injunction, the Montana Commission issued a second order. The federal court interpreted the Montana Commission's second order as follows:

Additionally, Order No. 6063c [the second order] provides U S WEST with further opportunities. When U S WEST receives customer initiated calls for new service or changes in service, the revised Order allows for deviation from any "script" in order to answer questions by customers. Further, if the customer wants to learn more about U S WEST long distance service, the Order

permits U S WEST to "refer these requests to a U S WEST telephone number for more information."

<u>U S WEST Communications, Inc. v. Rowe</u>, Cause No. CV 98-150-M-DWM, Order dated January 8, 1999 ("Order"), at 7 (Emphasis added). In part because the second order permitted U S WEST to deviate from a script "to answer questions by customers." the federal court did not invalidate the scripting orders pending a full trial on the merits of the case, which is scheduled for September 8, 1999.

Thus, if customers ask questions, whether they concern U S WEST's services or intraLATA services in general, U S WEST should be able to respond to those questions. To the extent the language of U S WEST's plan requires clarification on this point, U S WEST requests that it be allowed to answer questions from customers, as was permitted by the Montana Commission and as confirmed by the Montana fe leral court.

AT&T is correct that restrictions upon U S WEST's dissemination of information to its customers invoke the test adopted by the United States Supreme Court in <u>Central Hudson Gas & Electric Corp. v. Public Service Comm'n of New York</u>, 447 U.S. 557, 566 (1980). If the speech to be disseminated is accurate, then the governmental agency has the burden of showing that the restriction on speech is supported by a substantial state interest, directly advances a substantial state interest, and is no more restrictive than necessary. <u>Id</u>.

AT&T inaccurately contends that the information that U S WEST wishes to disseminate, whether in Montana or in South Dakota, is "misleading." U S WEST will provide accurate information to customers, such as "U S WEST is a provider of services," and will answer accurately any questions from customers. As stated by the federal court in Montana, "[n]o assertion has been made that U S WEST's active promotion of its services is untruthful." Order, at 6.

Also, the South Dakota situation is also far different from the one in Montana. The state interest asserted by the Commission in Montana that was necessary to support the scripting requirement was the fostering of a competitive market for intraLATA services. U S WEST respectfully disagrees with the Montana Commission that intraLATA services in that state are not fully competitive at the present. But there should be no dispute in South Dakota that U S WEST does not have a monopoly upon intraLATA services. In fact, the South Dakota Commission in 1992 ruled that the intraLATA market is fully competitive, with the exception of U S WEST's services, which are categorized as emerging competitive until the implementation of dialing parity, which will occur on July 22, 1999.

Also, AT&T is incorrect in its suggestion that new customers are locked into U S WEST's services. Upon implementation, customers may choose a new PIC. And anytime after implementation, customers can select another carrier if they consider U S WEST's rates to be higher than other carriers or if they prefer the service provided by another carrier. Therefore, if U S WEST were to offer services that are not competitive, or if a customer simply wishes to change intraLATA carries, they can do so easily.

In short, the market is highly competitive in South Dakota, as determined in 1992 by this state Commission. Due to the existence of a fully competitive market, there is no state interest that is necessary to support restrictions upon U S WEST's speech. Absent a substantial state interest, any and all restrictions upon U S WEST's speech to market its services would be incompatible with the first amendment.

Also, it is important for the Commission to know the burden that it carries when it restricts speech. The Montana federal court cited the case of <u>Florida Bar v. Went For It. Inc.</u>, 515 U.S. 618 (1995), which is the only United States Supreme Court that has upheld a state

restriction upon commercial speech. There, the Florida agency compiled data over two years and from numerous sources to show that a restriction upon attorney solicitation of accident victims for a limited thirty-day period directly advanced the state's interests. Here, in South Dakota, there has been no compilation of data showing that restricting U S WEST's accurate dissemination of information advances any state interest. Further, speech restrictions of unlimited duration are particularly violative of the first amendment.

In sum, U S WEST's proposed plan takes into consideration prior decisions of other state commissions as well as the federal court's ruling in Montana. It strikes the proper balance of informing customers of their choices for intraLATA carriers, without improperly restricting U S WEST from informing customers that U S WEST is a provider, or from answering customers' questions.

Classification of U S WEST's IntraLATA Toll Services as Fully Competitive

U S WEST requests classification of its intraLATA services as fully competitive pursuant to the authority of this Commission's ruling in 1992. That ruling classified intraLATA services in South Dakota as fully competitive for every carrier except U S WEST, whose services remained classified as emerging competitive until dialing parity is implemented. There should be no dispute that the impediment to classification of U S WEST's services as fully competitive will be removed with the implementation of dialing parity on July 22, 1999.

Under the 1992 decision, the issue of reclassification should be ministerial, and does not require the commencement of protracted proceedings before the Commission. Therefore, pursuant to the 1992 decision, and in the interest of competitive neutrality among all intraLATA carriers, U S WEST requests that its intraLATA services be classified as fully competitive as of July 22, 1999.

Calls Eligible/Not Eligible for Presubscription

Directory Assistance calls places via any dialing pattern should be considered local calls and not subject to presubscription. Calls to Directory Assistance, when charged, are flat rated and not billed at a per minute rate as 1+/0+ call types are. While AT&T's comments correctly reference the Iowa Board's decision to route these calls to the customers' presubscribed 1+ intraLATA carrier, AT&T fails to identify the ten states in which the commissions ruled to exclude these call types from the presubscription process.

Dialing parity is defined as the ability to route customer calls placed via a 1+/0+ dialing pattern to the customers presubscribed intraLATA carrier. Presubscribed directory assistance, or 411 calls, is beyond the scope of the dialing parity requirement.

The Authorization Date Must Be Expanded

AT&T's comments oppose the thirty-day window for solicitation of new customers. Marketing activities should not occur before providers and consumers are advised of the new rules concerning dialing parity. U S WEST does not anticipate final approval of its plan until approximately June 22, 1999, with implementation to occur thirty days later, or approximately July 22, 1999. The thirty-day window of opportunity should be adequate to launch marketing activities. To expand that window any further may result in an increase in customer confusion." That is, customers who request a change to an alternative provider expect that the change will be completed in a timely manner. To allow for an expanded window will cause customer dissatisfaction, while at the same time increase calls to U S WEST business offices to question why their change has not been processed. Therefore, marketing to customers should not begin until a final order clearly outlining the rules has been issued to this Commission. That order is expected on June 22, 1999, thirty days prior to the scheduled implementation date of July 22, 1999.

AT&T's suggestion that U S WEST "accept intraLATA PIC changes 60 days prior to implementation," or an inference that "better information about the conversion volumes will allow U S WEST to more concisely prepare for a problem-free implementation" should be rejected. U S WEST is not new to the process and has to date implemented 1+ intraLATA toll dialing parity in 12 individual jurisdictions. U S WEST currently has no method of accepting pre-selection orders either from the end user or the carrier. Based upon its experience in other states, U S WEST does not anticipate a problem in being current by the first day of implementation. U S WEST will begin accepting requests for a change in intraLATA providers from both end users and the carriers on the first day of implementation.

"FREE" Change Period

This issue addresses the period of time during which U S WEST will waive charges for changing a customer's intraLATA presubscribed carrier. U S WEST does not object to the Staff's recommendation of increasing the grace period from 30 to 60 days. As the Commission Staff stated in its comments, "60 days would allow the customer to receive at least one bill from the intraLATA carrier." In actuality, a 60-day waiver period following implementation, in addition to having been noticed 30 days prior to implementation, allows the customers a 90 day window to research and determine which providers may best suit their calling needs.

AT&T correctly addresses the 120-day waiver period ordered by the Colorado, Utah, Oregon and Iowa Commissions; however, AT&T inaccurately states that U S WEST proposed the 120-day waiver period in Washington. AT&T also fails to note that commissions in other states have ordered waiver periods ranging from no waiver period at all to 60 days following implementation.

Simultaneous PIC Selections of IntraLATA and InterLATA Carriers

U S WEST's advocacy of assessing the PIC change charges to either the end user or the carrier has remained constant in all states where a toll dialing parity plan has been filed. Upon the implementation of dialing parity, U S WEST must not only describe and assign the customers' interLATA selection, but also discuss and describe an additional choice, that of the intraLATA provider. In the 15 years since the inception of interLATA equal access, the industry is no closer to assisting customers in their understanding of the LATA concept. Thus, assigning PIC changes on the basis of the intraLATA selection adds additional time to the process.

U S WEST is willing to compromise on the issue of assessing multiple \$5.00 charges when changing the customers' selection of interLATA and intraLATA provider on the same order at the same time. Similar to commission orders received in Washington, Nebraska, and Utah, and awaiting commission approval in Colorado, U S WEST offers the following approach. When a customer contact results in the simultaneous change of both the interLATA and intraLATA provider on the same order, U S WEST will apply the FCC mandated interLATA PIC change charge of \$5.00, and a discounted charge of \$2.50 for the change of the intraLATA provider.

Cost Recovery

U S WEST will be filing its proposed proprietary cost study probably during the week of May 17, 1999. U S WEST used the same model for its South Dakota cost study as it used in all of the other U S WEST states where it has implemented dialing parity. The study should be available to all parties agreeing to non-disclosure and will be open to comments pursuant to the typical regulatory process utilized by state commissions.

The one-time bulk bill proposed by U S WEST, which allows recovery for the waived PIC charges associated with the changes made during the grace period, is reasonable. This bulk bill allows immediate recovery from the participating carrier who obtained the end user and who immediately realizes profits from that subscriber. Otherwise, competitors will be able to realize an instant profit without investing anything in the implementation of dialing parity.

Customer Requested PIC Freezes

AT&T's and Sprint's comments overstate the issue regarding the inclusion of PIC freezes for intraLATA carriers when customers have requested PIC freezes of their interLATA carrier. Further, AT&T's and Sprint's comments do not recognize the consumer perspective of this issue. The Commission Staff's comments have also questioned U S WEST's proposal on this matter.

Importantly, every state commission that has considered the issue has authorized U S WEST to include an intraLATA freeze for all customers who have requested a long distance freeze before the implementation of dialing parity. All seven commissions in U S WEST's region to consider this issue to date have ordered U S WEST, in one form or another, to freeze the intraLATA carrier for all customers who had previously requested an interLATA PIC freeze. Arizona, Minnesota, Montana, Utah, Washington and Wyoming all approved U S WEST's Dialing Parity Plan. Iowa approved U S WEST's Dialing Parity Plan, but prohibited it from

implementing such intraLATA PIC freezes until 120 days after the intraLATA market was opened. New Mexico was informed about U S WEST's plan in advance of the implementation of dialing parity, but has never either directly or indirectly approved the plan. However, on July 30, 1998, U S WEST implemented the same PIC freeze policy in New Mexico without complaint of any type until 30 April 1999.

The PIC freeze option arose as a consumer solution to the rampant slamming problem. PIC freezes are customer-initiated requests to the local exchange carriers to freeze their presubscribed carriers absent the customers' express consent to change carriers.

In South Dakota and in other states before the implementation of dialing parity, customers called U S WEST to freeze their interexchange carriers. Because presubscription applied only to interLATA services due to the absence of intraLATA dialing parity, the customers' account showed a freeze for only the interLATA PIC. However, it is the customers' expectation that the LEC will not change their toll provider, any toll provider, absent their consent.

With the implementation of dialing parity, customers can choose separate intraLATA and interLATA carriers, and they can freeze their intraLATA or interLATA PIC. U S WEST is complying with, and will continue to comply with, the FCC rules made effective April 27, 1999. Pursuant to these rules, U S WEST will obtain separate authorizations during customer-initiated calls for freezes to either an intraLATA or interLATA account. There is no dispute from U S WEST's perspective about that issue. But, neither the FCC rules nor the comments of AT&T address the issue of how to handle the customers' requests made long before the implementation of dialing parity or their expectations that their toll carriers will not be changed absent their express consent.

If pre-implementation PIC freezes do not also include intraLATA PIC freezes, then customers will experience intraLATA PIC changes without their knowledge or consent. U S WEST is in the difficult position of having accepted the customers' requests for PIC freezes, and then suffering the customers' indignation when customers learn that one of their presubscribed carriers has been changed without their consent.

Of course, much of this problem is due to a lack of understanding about the two PIC process and the ability to freeze interLATA and intraLATA PICs separately. Therefore, to address the concerns of other intraLATA carriers and in order to promote consumer awareness, U S WEST has implemented a notification process. U S WEST's customer notification states that the customer's requested PIC freeze includes their intraLATA PIC. The notice also clearly states that, if customers wish to change their intraLATA PIC, then they may call U S WEST to do so. This process balances the customers' expectations regarding their pre-dialing parity requests for PIC freezes with the interest of fostering competition and choice in the intraLATA market.

Dated this 17th day of May, 1999.

hude na By:

Todd L. Lundy Senior Attorney U S WEST, Communications, Inc. 1801 California, Suite 5100 Denver, CO 80202 (303) 672-2783

EXHIBIT 1

Before the RECEIVED FEDERAL COMMUNICATIONS COMMISSION Washington, D 20554 MAY 1 2 1000

		PERSONAL BORNESS
In the Matters of)	GEFFELE OF THE SECTOR
)	
Implementation of the Local)	
Competition Provisions of the)	
Telecommunications Act of 1996)	CC Docket No. 96-98
Petition of U S WEST Communications,	;	
Inc. for Waiver of Dialing Parity)	NSD File No. 99-XXX
Dates Established in March 23, 1999)	
Dialing Parity Order)	

PETITION FOR WAIVER OF US WEST COMMUNICATIONS, INC.

Kathryn Marie Krause Suite 700 1020 19th Street, N.W. Washington, DC 20036 (303) 672-2859

Attorney for

U S WEST COMMUNICATIONS, INC.

Of Counsel, Dan L. Poole

May 12, 1999

TABLE OF CONTENTS

I.	INTRODUCTION AND SUMMARY		
п.	CIRC	UMSTANCES NECESSITATING THE INSTANT WAIVER	
	A .	Legal/Regulatory Environment	
	B.	South Dakota And North Dakota Filed Dialing-Parity Plans6	
	C .	Existing Network Architecture Involving The Three Wire Centers	
	D.	State Regulatory/Judicial Activity	
	E.	Implementation Of Dialing Parity In New Equipment	
	F.	Direct Customer Impacts	
ш.	A WA	IVER IS CLEARLY WARRANTED	

Page

Before the FEDERAL COMMUNICATIONS COMMISSION Washington, DC 20554

In the Matters of)
Implementation of the Local)
Competition Provisions of the)
Telecommunications Act of 1996) CC Docket No. 96-98
Petition of U S WEST Communications,	/))
Inc. for Waiver of Dialing Parity) NSD File No. 99-XXX
Dates Established in March 23, 1999)
Dialing Parity Order)

PETITION FOR WAIVER OF US WEST COMMUNICATIONS, INC.

I. INTRODUCTION AND SUMMARY

U S WEST Communications, Inc. ("U S WEST"), pursuant to 47 C.F.R. Section 1.3, petitions this Federal Communications Commission ("Commission" or "FCC") for a limited waiver of the July 22, 1999 implementation date for intraLATA dialing parity, as established by the Commission in its recent <u>March 23 Dialing</u> <u>Parity Order</u>.' Specifically, U S WEST seeks a waiver with respect to a small geographic area in two states, involving three wire centers and affecting less than 1,000 access lines.

¹ In the Matters of Implementation of the Local Competition Provisions of the <u>Telecommunications Act of 1996, Petition of Southwestern Bell Telephone</u> <u>Company, Pacific Bell, and Nevada Bell for Expedited Declaratory Ruling on</u> <u>Interstate IntraLATA Toll Dialing Parity or. in the Alternative, Various Other</u> <u>Relief.</u> CC Docket No. 96-98, NSD File No. 98-121, <u>Order</u>, FCC 99-54, rel. Mar. 23, 1999.

As outlined further below, the recent federal legal holdings associated with the imposition of intrastate toll dialing parity, combined with the Commission's failure to take action on a Petition filed in January, 1998 asking for federal preemption over the South Dakota exchange sales,² has created legal obligations with respect to intrastate dialing parity that were not anticipated by U S WEST. Indeed, such obligations were inconsistent with existing state legislative mandates.

The conjunction of these newly-articulated legal obligations with existing switching equipment that cannot support intrastate dialing parity in a small portion of North Dakota and South Dakota communities puts U S WEST in the position of needing a limited waiver. Three wire centers in South Dakota (which also serve less than 100 North Dakota customers) are affected by a decision made late last year and early this year to change out existing switching equipment. The equipment will not even be installed and turned over to U S WEST by the vendor until late August. It will then take a number of months to convert and test the new switching equipment that will be capable of providing dialing parity.

The switching equipment at issue was the subject of a contract of sale to the Telephone Authority, organized under the authority of the Cheyenne River Sioux

³ The Cheyenne River Sioux Tribe Telephone Authority's and U S WEST Communications, Inc.'s Joint Petition for Expedited Ruling Preempting South Dakota Law, CC Docket No. 98-6, filed Jan. 22, 1998 ("U S WEST's 1998 Petition"). In that Petition, U S WEST argued that the actions of the State Commission, in denying the exchange sales on the grounds that the Telephone Authority refused to waive its sovereign immunity, were in contravention of 47 U.S.C. Section 253(d) in that they prohibited or had the effect of prohibiting the Tribal Authority from providing intrastate telecommunications service. Thus, U S WEST and the Telephone Authority asked for Commission intervention in the form of preemption. No action has been taken on the Petition.

Tribe, which was executed in December, 1994. The equipment subject to the sale -all physically located on Indian Reservation land -- was not slated for an upgrade after 1994 because of the "impending" transfer from U S WEST to the Telephone Authority. Furthermore, the equipment is not Y2K compliant.

The culmination of the sale has been delayed, however, as a result of rulings by the South Dakota Public Utilities Commission ("State Commission"). Those rulings have been challenged in the past and continue to be challenged, not only in state fora but before this Commission as well. Because no positive resolution of the legal contention has been forthcoming, at the end of 1998, U S WEST began to revise its expectations regarding the to-be-sold equipment. Since it was increasingly apparent that such equipment might remain under U S WEST's ownership and control for a number of months more, U S WEST began to assess the equipment for Y2K compliance.

As discussed further below, the fact that both North Dakota and South Dakota had statutory prohibitions against the immediate deployment of dialing parity <u>and</u> that the FCC's dialing-parity rules had been vacated, resulted in dialingparity considerations not being a driving factor in U S WEST's initial assessment of the continued viability of the equipment into the twenty-first century; or the need to change-out the equipment according to a timeframe more accelerated than that worked out by U S WEST in the first quarter of 1999.

In February of 1999, U S WEST purchased new DMS10 switching equipment to serve those North Dakota and South Dakota communities affected by the pending sale in a Y2K compliant manner. The recent dialing-parity rulings,

however, make clear that dialing-parity functionality is as critical as Y2K compliance with respect to the equipment serving those Dakota communities.

The purchased DMS10 switches can be made dialing-parity capable. However, as explained further below, due to the current installation and cutover timeline associated with this new equipment, as well as other scheduled switch installations, the equipment cannot be expected to incorporate working dialingparity capabilities until the end of this year. For this reason, we request the instant waiver.

II. CIRCUMSTANCES NECESSITATING THE INSTANT WAIVER

A. Legal/Regulatory Environment

As the Commission recently acknowledged in its <u>March 23, 1999 Dialing</u> <u>Parity Order</u>, its previously-promulgated dialing-parity rules were vacated by the Eighth Circuit Court of Appeals in August of 1997.' At the same time that court action was occurring, there existed a statutory provision in South Dakota that alleviated U S WEST from any obligation to provide dialing parity until the time that we were permitted to enter the interLATA, interexchange toll market.'

^{&#}x27;<u>California v. FCC</u>, 124 F.3d 934 (8th Cir. 1997), cited in the <u>March 23 Dialing</u> <u>Parity Order at ¶ 3 and n. 14</u>.

^{*}S.D.L.C. 49-31-87. After the Supreme Court decision in <u>FCC. et al., v. Iowa Utils.</u> <u>Bd., et al.</u>, No. 97-1519, 1999 WL 80281 (U.S. Feb. 22, 1999), the South Dakota legislature amended the referenced statutory section to require intraLATA toll dialing parity on January 1, 2000.

Similarly, in North Dakota, the legislature had promulgated a statute exempting all local exchange carriers ("LEC") from having to provide dialing parity.'

Because U S WEST was not actively seeking to provide interLATA, interexchange services in South Dakota in the 1997-1998 timeframe, under thenexisting jurisprudence and legislative imperatives, there was no reason for U S WEST to be reviewing its telecommunications equipment inventory for dialingparity capabilities within that state. Similarly, due to the North Dakota exemption from dialing-parity obligations, the lack of such capabilities in switching equipment serving North Dakota citizens was not of significant concern to U S WEST. Indeed, as outlined above, U S WEST was paying more attention to the Y2K capabilities of the equipment that was subject to the pending sale between U S WEST and the Telephone Authority than to the dialing-parity capabilities.

In January of this year, the Supreme Court overruled the opinion of the Eighth Circuit and reinstated the Commission's dialing-parity rules.[•] Thereafter, the Commission promulgated its <u>March 23 Dialing Parity Order</u> outlining how affected LECs were to implement dialing parity across the nation on a goingforward basis.

¹ 1999 N.D. Cent. Code, Section 49-21-08.1 (dialing parity may not be required to be provided by any company providing local exchange service), *expires on July 31*, *1999*); <u>amended by Senate Bill 2420</u> approved by the Governor, Mar. 17, 1999 (extending date for dialing-parity implementation to January 1, 2000).

AT&T Corp., et al. v. Iowa Utilities Board, et al., 119 S.Ct. 721 (1999).

In that <u>Order</u>, the Commission made specific note of the fact that "[n]o [dialing parity] proceeding [was] pending in North Dakota and South Dakota."' The absence of any prior dialing-parity proceeding in either North Dakota or South Dakota, in conjunction with the long-standing pending sale of equipment in three South Dakota wire centers, has created a situation in which U S WEST is unable to implement dialing parity in those wire centers because the existing equipment cannot accommodate such capability in any reasonably cost-effective manner. These facts are outlined further below.

B. South Dakota And North Dakota Filed Dialing-Parity Plans

In its <u>March 23 Dialing Parity Order</u>, the FCC required that LECs, such as U S WEST, implement 2-PIC ("Preferred Carrier") toll dialing parity 30 days following state approval of a toll dialing-parity plan. U S WEST's plan for dialing parity in South Dakota was filed with the South Dakota Public Utilities Commission on April 22, 1999. It outlines the statewide implementation of toll dialing parity, acknowledging the need to seek a waiver with this Commission with respect to certain wire centers in South Dakota.

It is anticipated that state PUC approval of the plan will occur no later than 60 days after that date, or around June 22, 1999. Implementation of the plan is expected thirty days after that, or around July 22, 1999.

March 23 Dialing Parity Order at n. 21.

^{*} These dates reflect the requirements imposed by the Commission's <u>March 23</u> <u>Dialing Parity Order</u> ¶ 7.

As indicated above, the dialing-parity plan filed in South Dakota does <u>not</u> contemplate implementing dialing parity in three South Dakota wire centers -specifically, McIntosh (with 247 access lines)," Timber Lake (with 503 access lines) and Morristown (with 217 access lines)." All told, these three wire centers -- all of which are located within the boundaries of Native American Reservations" -involve 967 access lines out of a South Dakota customer base of approximately 250,000 access lines, or .004 percent.

Also, on April 22, 1999, U S WEST filed a dialing-parity plan in North Dakota. That Plan, like the South Dakota plan, pointed out the fact that U S WEST would be seeking a waiver from this Commission with respect to toll dialing-parity obligations attendant to the South Dakota equipment serving a small number of North Dakota customers.

C. Existing Network Architecture Involving The Three Wire Centers

In the past, the above-referenced wire centers have been deployed through a host/remote cluster architecture supported by Ericsson equipment, with the identified offices being "remotes" off of a host in a different South Dakota town (Mobridge). As a result of the exchange sales activities undertaken by U S WEST over the past few years in South Dakota, the host switch in Mobridge was sold to

* Seventy-nine of these access lines are associated with North Dakota customers.

^{*} Six of these access lines are associated with North Dakota customers.

[&]quot;The Timber Lake exchange is located within the boundaries of the Cheyenne River and Standing Rock Indian Reservations. The McIntosh and Morristown exchanges are located within the boundaries of the Standing Rock Indian Reservation. See South Dakota Map attached hereto.

one entity (West River Communications), and the wire centers supported by the remotes were to be sold to another entity (Owl River Telephone, Inc. ("Owl River"))."

Due to certain regulatory and legal actions outlined in greater detail below, the sale of the remotes has been stalled, leaving said remotes in U S WEST's possession for the time being. Moreover, West River Communications, the owner of the host switch (<u>i.e.</u>, the Ericsson switch in Mobridge), is replacing it with a new switch that will technically no longer be capable of supporting the affected remote switches.

West River Communications had offered to sell the "host" switch back to U S WEST. However, for sound business reasons outlined below, U S WEST did not consider such purchase to be a wise investment, either from a commercial or policy perspective. Rather, U S WEST chose to purchase new switching equipment that would be Y2K compliant and would support toll dialing-parity functionality. Should the sale ultimately be awarded regulatory approval, the Telephone Authority has agreed to purchase the new equipment."

D. State Regulatory/Judicial Activity

The history of U S WEST's activity with respect to the sale of the affected wire centers to the Telephone Authority reflects a contentious and litigious journey. In the Petition filed with this Commission in January of 1998, U S WEST outlined

[&]quot; Owl River is a subsidiary of the Telephone Authority.

in great detail the facts and history associated with the exchange sales to the Telephone Authority." While U S WEST is without question an "affected party," the fundamental disputes associated with the sale are between two South Dakota sovereigns: the tribal Telephone Authority and the State Commission.

In July of 1995, the State Commission denied the sales of the Timber Lake, Morristown and McIntosh telephone exchanges by U S WEST to the Telephone Authority. The State Commission essentially gave four reasons for the denial: 1) that the Telephone Authority, a tribally-chartered organization, refused to waive its sovereign immunity; 2) that because of such immunity, the State could not enforce the collection of gross receipts and sales taxes on the Telephone Authority; 3) that the State Commission would lose regulatory authority over the exchanges after the sales; and 4) approval would constitute an improper delegation of the State Commission's authority.

U S WEST and the Telephone Authority promptly appealed the decisions to the Circuit Court of Hughes County, South Dakota. In February of <u>1997</u>, the Court issued a lengthy Memorandum Opinion holding, in essence, that the State Commission had jurisdiction over the exchange sales." However, the Court found that the State Commission's decision to deny the sales in absence of a waiver of

[&]quot;This would be consistent with the Telephone Authority's commitment to provide state-of-the-art equipment and a range of up-to-date services to the exchanges affected by the sale, as it does to its existing customer base.

[&]quot;There, U S WEST referenced what we described as "a procedurally complex set of facts" (at 2) which was presented in Appendix A-1 through A-14.

[&]quot;The complete text of this Court opinion can be found as Attachment 1 to U S WEST's 1998 Petition, cited note 2, <u>supra</u>.

sovereign immunity conflicted with tribal and federal interests." Thus, in March, 1997, the matter was remanded for reconsideration by the State Commission.

The State Commission entered further decisions in August, 1997, in which it again denied the exchange sales. The State Commission held that the sales were not in the public interest because of a perceived lack of regulatory control over the purchaser and the potential loss of revenue to the state."

The matter was appealed a second time to the same South Dakota Circuit Court (Hughes County). The Court entered an order in February, 1998, affirming in total the second decision of the State Commission."

U S WEST and the Telephone Authority then appealed to the South Dakota Supreme Court, the highest level of appellate review in South Dakota. The parties submitted briefs, and oral argument was made to the Court on January 13, 1999. In South Dakota, it is customary to receive Supreme Court decisions within approximately six months from the date of the oral argument.

Since the oral argument before the Supreme Court, there have been discussions among the various interested participants, <u>i.e.</u>, State of South Dakota, the State Commission, the Telephone Authority and U S WEST, to resolve the

[&]quot;The Court also held that the equal protection arguments were not ripe for review and that the State Commission erroneously ruled that the sale would constitute an improper delegation of authority.

[&]quot;The complete text of these Decisions can be found as Attachments 2-4 of U S WEST's 1998 Petition.

[&]quot;This court opinion, having been rendered subsequent to the filing of U S WEST's 1998 Petition was not included in that filing. A copy can be obtained for Commission review, should the Commission be interested in the precise text of the opinion.

matters that are subject to the Supreme Court's review. At this time, these discussions continue in an attempt to resolve these matters.

E. Implementation Of Dialing Parity In New Equipment

As mentioned above, the current owner of the host switch had offered to sell it back to U S WEST. However, U S WEST declined the offer, given the absence of cost-effective means to render the switch Y2K compliant. The same technological shortcomings that made the switch one that the owner was willing to sell made it a bad investment for U S WEST.

Rather, U S WEST's business planning activities demonstrated that the better approach was to purchase a Nortel DMS10 switch, to be located in the town of McIntosh. (This decision was also supported by the potential purchasers of the equipment.) The McIntosh switch will operate as a host switch for new Nortel remote switches to be placed in Timber Lake and Morristown.

In February of 1999, U S WEST placed the orders for the switches and -- if all goes according to plan -- we expect shipment around the end of May. Once U S WEST takes possession of the equipment, the vendor (Nortel) will begin the installation. Before the switching equipment is turned over to U S WEST, the vendor has to move into each site, bolt equipment to the floors, and attach power equipment and cross connect blocks, so that customers' lines and trunks can be attached to this equipment.

This vendor work associated with the installation of the new host switch (McIntosh) is expected to take about four weeks, with an additional four to six weeks of installation time expected with respect to the two remotes (Timber Lake

11

and Morristown). Because the McIntosh wire center is being converted from a remote to a host switching center, there are requirements by the vendor that the power plant associated with the wire center be upgraded to meet the requirements for the new host switch. The standard interval for the provision of such power plant capabilities is six months. U S WEST has communicated with the vendor of this equipment that we have an urgent need for expedition. We believe this request has been escalated within the management ranks of the vendor and that, as a result, the necessary equipment will be available by the end of July, 1999.

At the point at which the vendor turns over the switching equipment to U S WEST, U S WEST will need to complete both outside and inside plant work, as well as labor-intensive translations work to cutover from the old offices. The outside plant work will involve the placement of additional radio facilities to handle the need for more capacity between McIntosh and Timber Lake (now that McIntosh, rather than Mobridge, is the "host" location).

Inside the offices, all lines and trunks in each central office -- including all special circuits serving business customers -- have to be physically wired to the new switching equipment. The personnel that will be doing this work, and maintaining the three offices) live 180 miles to the east of the wire centers (i.e., they live in Aberdeen, South Dakota) and are responsible for equipment at their Aberdeen staffed location, as well. Thus, the employees will have to work in shifts on the McIntosh, Timber Lake and Morristown conversions.

Once the affected lines are "y-spliced" (or half-tapped), the software is loaded into the switch and then board-to-board test procedures are conducted on each line

12

and trunk to ensure there are no hardware or software problems. Any discovered problems are fixed. This "testing/fixing" activity is done a minimum of three times so that all discovered problems are corrected prior to switch turnup.

Furthermore, the Ericsson software has certain calling features that U S WEST's customers are using today which have to be identified and compared with the Nortel switch features for proper translations into the new switch. If the feature translation cannot be accomplished or the manner in which the feature is used will change, customers will have to be notified.

It is anticipated that this work will take at a minimum 60 days, suggesting a "ready for cutover" date of around the end of October. However, this date could easily be delayed, given that U S WEST has never conducted an Ericsson to Nortel conversion and the anticipated conversion dates could prove unduly optimistic given the tasks which actually greet the network technicians.

U S WEST's Network Reliability Operations Center ("NROC") will have to establish an actual cutover date for the new switching equipment, which obviously cannot occur until all of the necessary installation work is completed. Right now, the NROC is scheduling switch cutovers for switches <u>already</u> in queue (<u>i.e.</u>, all predicate technical work having been or to be completed) into the September through November timeframes. Assuming that the actual cutover will be ready to occur in November, the NROC has to add these switches to its schedule of cutovers for that month.

U S WEST, like other carriers is attempting to build in a "quiet time" for the months December, 1999 and January, 2000 to allow for responses to unanticipated Y2K compliance issues. Thus, the scheduling of routine switch replacements has been somewhat accelerated (i.e., to avoid the months of December and January) and compressed. The cutover of the switches in South Dakota will need to be incorporated into this switch replacement schedule.

For all of the above reasons, U S WEST can only say that the equipment will be cutover sometime during the last quarter of 1999, probably after the end of October. Therefore, we would ask for a waiver date through December 31, 1999 (in case the cutovers could not be done before the beginning of December and have to be scheduled for the quiet period). Of course, if the equipment can be cutover earlier than that date, U S WEST will do so.

F. **Direct Customer Impacts**

Installation of DMS10 switching capabilities will ultimately provide more benefits to customers in the affected wire centers than the previously deployed equipment. For example, the switches will be Y2K compliant and will be able to support CLASS services, including Caller ID. Overall, the change-out in equipment clearly provides a net gain to the affected South Dakota customers."

[&]quot;As indicated above, the affected wire centers are all on Native American land. The Telephone Authority "has been committed to working with the communities within the proposed exchanges to insure that telephone services needed to attract new business and to keep existing businesses are available at competitive rates." US WEST 1998 Petition at 6. Moreover, the expansion of service options available through the new switching equipment is consistent with the Commission's objectives about expanding local services to Native Americans. See, e.g., Remarks of Chairman William E. Kennard, Federal Communications Commission, Public Hearing on Telephone Service to Indians on Reservations, "Overcoming Obstacles to Telephone Service to Indians on Reservations," Alb: querque, New Mexico, Friday, January 29, 1999 (As Prepared for Delivery).

Should this waiver request be granted, it is U S WEST's current intention to send a direct mail notice to all customers served by the affected wire centers advising them that the date for 2-PIC toll dialing parity has been extended in their exchange(s) in accordance with the terms of the waiver granted.

III. A WAIVER IS CLEARLY WARRANTED

The instant waiver request is supported by imperatives of a legal and technical nature. While the legal aspects of the case primarily represent a "drag" factor with respect to U S WEST's ability to implement dialing parity on July 22, 1999,³⁰ the technical problems are inherent in the currently-utilized equipment. "Technical problems caused by purely exogenous circumstances may constitute special circumstances that would justify the granting of a waiver in the public interest.³⁰ Here the public interest would cortainly not be served by trying to gerryrig some type of dialing-parity capability on the previously-deployed equipment. It is better served by eliminating the "technical problem" through investment in more robust technology.

²⁸ That is, the "ideal" situation from U S WEST's perspective would have been that either the state appellate proceedings <u>or</u> our request for preemption to this Commission filed in early 1998 (or both) would have resolved the fundamental legal issues in such a manner that U S WEST and the Telephone Authority had a better sense of their legal property and common carrier rights with respect to the desired cale. As one awaits the legal resolution, there is a tendency to delay with respect to moving forward with "contingency plans," such as waiver filings, believing that relief is "just around the corner."

³¹ Implementation of the Local Competition Provisions of the Telecommunications Act of 1996. Petition of Southwestern Bell Telephone Company. Pacific Bell, and Nevada Bell for Expedited Declaratory Ruling on Interstate IntraLATA Toll Dialing Parity or. in the Alternative. Various Other Relief. Order. CC Docket No. 96-98, NSD File No. L-98-121, FCC 99-781 (rel. Apr. 22, 1999) ¶ 12.

Furthermore, the scope of the instant waiver request is well within a zone of reasonableness regarding implementation of 2-PIC dialing parity. While the implementation dates are beyond those outlined by the Commission in its <u>March 23</u> <u>Dialing Parity Order</u>, the number of affected wire centers and access lines is small.

The existing special circumstances clearly warrant a deviation (slight at that) from the Commission's general rule and demonstrate a "more effective implementation of overall policy."²² Given the overall benefit that will inure to the residents now served by the existing technology, granting U S WEST's waiver request will result in a "predictable, workable"²⁰ solution that causes little injury to the consumer or competition.

For all of the above reasons, U S WEST urges the Commission to grant the instant Waiver Petition and allow U S WEST to implement dialing parity in the three-identified wire centers by December 31, 1999.

Respectfully submitted,

U S WEST COMMUNICATIONS, INC.

By:

Shign Man Krause

Kathryn Marie Krause Suite 700 1020 19th Street, N.W. Washington, DC 20036 (303) 672-2859

Its Attorney

Of Counsel, Dan L. Poole

May 12, 1999

" Id. ¶ 11.

" Id.

CERTIFICATE OF SERVICE

I, Kelseau Powe, Jr., do hereby certify that on this 12th day of May, 1999, I have caused a copy of the foregoing PETITION FOR WAIVER OF U S WEST COMMUNICATIONS, INC. to be served, via hand delivery, upon the persons listed on the attached service list.

Kelseau Powe, Jr.

William E. Kennard Federal Communications Commission 8th Floor Portals II 445 12th Street, S.W. Washington, DC 20554 Gloria Tristani Federal Communications Commission 8th Floor Portals II 445 12th Street, S.W. Washington, DC 20554

2.

Michael K. Powell Federal Communications Commission 8th Floor Portals II 445 12th Street, S.W. Washington, DC 20554 Harold Furchtgott-Roth Federal Communications Commission 8th Floor Portals II 445 12th Street, S.W. Washington, DC 20554

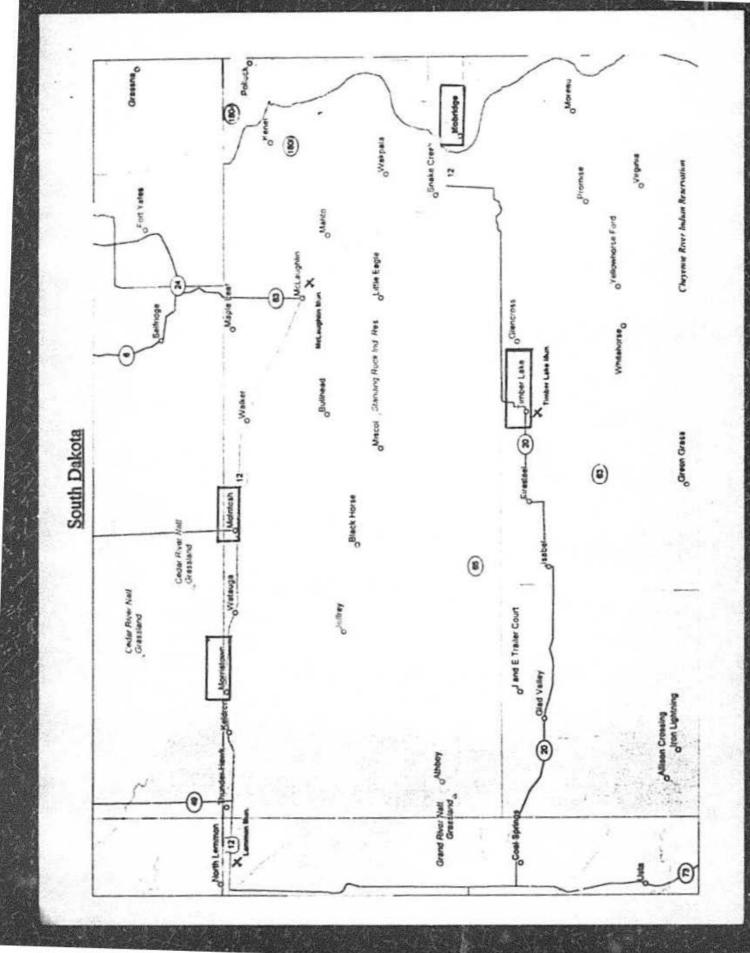
Susan P. Ness Federal Communications Commission 8th Floor Portals II 445 12th Street, S.W. Washington, DC 20554

Anna Gomez Federal Communications Commission Room 6-A324 Portals II 445 12th Street, S.W. Washington, DC 20554

Al McCloud Federal Communications Commission Suite 6-A320 Portals II 445 12th Street, S.W. Washington, DC 20554 Lawrence E. Strickling Federal Communications Commission 8th Floor Portals II 445 12th Street, S.W. Washington, DC 20554

Gregory Cooke Federal Communications Commission 6th Floor Portals II 445 12th Street, S.W. Washington, DC 20554

International Transcription Services, Inc. 1231 20th Street, N.W. Washington, DC 20036



r B

EXHIBIT 2

S.No	Dakota Clii's, NPA/NXX a CLLI	CITY	NPA	N)	X
	1 SXFLSDCODS0	SIOUX FALLS (HOST)		605	1
	2 HURNSDCODS0	HURON (HOST)		605	2
	3 WTTWSDCODS1	WATERTOWN (HOST)		605	3
	4 SOLDSD01CG0	CLLI SOLD		605	4
	5 SOLDSD02CG0	CLU SOLD		605	5
	6 FTPRSDCERS1	FORT PIERRE		605	223
	7 PIRRSDCODS6	PIERRE		605	224
	8 ABRDSDCO22E	ABERDEEN		605	225
	9 ABRDSDC022E	ABERDEEN		605	226
	10 ABRDSDC022E	ABERDEEN		605	229
	11 SXCYIADTDS1	SIQUX CITY-DOWNTOWN		605	232
	12 SXCYIADTDS1	SIOUX CITY-DOWNTOWN		605	235
	13 MDSNSDCERS1	ADISON		605	256
10	14 WHWDSDCORS1	WHITEWOOD		605	269
	15 MCINSDCORS1	MCINTOSH		605	273
	16 SXFLSDCODS1	SIOUX FALLS CG1		605	322
	17 SXFLSDCO33A	SIOUX FALLS MAIN CG0		605	330
	18 SXFLSDCO33A	SIOUX FALLS MAIN CG0		605	331
	19 SXFLSDCO33A	SIOUX FALLS MAIN CG0		605	332
	20 SXFLSDCO33A	SIOUX FALLS MAIN CG0		605	333
	21 SXFLSDCO33A	SIOUX FALLS MAIN CG0		605	334
	22 SXFLSDCO33A	SIOUX FALLS MAIN CG0		605	335
	23 SXFLSDCO33A	SIOUX FALLS MAIN CG0		605	336
	24 SXFLSDCO33A	SIOUX FALLS MAIN CG0		605	338
	25 SXFLSDCO33A	SIOUX FALLS MAIN CG0		605	339
	26 RPCYSDCODS1	RAPID CITY CG1		605	341
	27 RPCYSDCODS1	RAPID CITY CG1		605	342
	28 RPCYSDCODS1	RAPID CITY CG1		605	343
	29 STRGSDCORS1	STURGIS		605	347
	30 RPCYSDCODS1	RAPID CITY CG1		605	348
	31 HURNSDCODS1	HURON		605	352
	32 HURNSDCODS1	HURON		605	353

33 RPCYSDCOD	S1 RAPID CITY CG1	605	355
34 ELPNSDCOR	S1 ELK POINT	605	356
35 SXFLSDCO3	3A SIOUX FALLS MAIN CG0	605	357
36 SXFLSDSWR	S1 SIOUX FALLS SOUTHWEST	605	361
37 SXFLSDSWR	S1 SIOUX FALLS SOUTHWEST	605	362
38 SXFLSDCOD	S1 SIOUX FALLS CG1	605	367
39 TEA-SDCORS	S1 TEA	605	368
40 SXFLSDSERS	S1 SIOUX FALLS SOUTHEAST	605	371
41 SXFLSDCO3	3A SIOUX FALLS MAIN CG0	605	373
42 ABRDSDCO2	2E ABERDEEN	605	377
43 VLNTNENWD	DS0 VALENTINE	605	378
44 WRWKSDCO	RS1 WARWICK	605	385
45 RPCYSDCOD	DS1 RAPID CITY CG1	605	388
46 RPVYSDCOR	RS1 RAPID VALLEY	605	393
47 RPCYSDCOD	DS1 RAPID CITY CG1	605	394
48 RPCYSDCOD	DS1 RAPID CITY CG1	605	399
49 STRGSDCOF	RS1 STURGIS	605	423
50 MLBNSDCOF	RS1 MILBANK	605	432
51 RDFDSDCOF	RS1 REDFIELD	605	472
52 MRTWSDCO	RS1 MORRISTOWN	605	524
53 CLMNSDCOF	RS1 COLMAN	605	534
54 IRQSSDCOR	S1 IROQUOIS	605	546
55 HLCYSDCOR	RS1 HILL CITY	605	574
56 SXFLSDCO3	3A SIOUX FALLS MAIN CG0	605	575
57 DDWDSDCO	RS1 DEADWOOD	605	578
58 LEADSDCOR	IS1 LEAD	605	584
59 CAVRSDCOR	RS1 CAVOUR	605	599
60 ABRDSDCO2	2E ABERDEEN	605	622
61 VRMLSDCOF	RS1 VERMILLION	605	624
62 ABRDSDCOF	RS2 ABERDEEN ISDN	605	626
63 VOLGSDCOF	RS1 VOLGA	605	627
64 SPRFSDCOR	RS1 SPEARFISH	605	642
65 SPRFSDCOR	S1 SPEARFISH	605	643
66 SPRFSDCOR	RS1 SPEAPFISH	605	644
67 YNTNSDCOD	DS1 YANKTON	605	655

68	YNTNSDCODS1	YANKTON	605	665
69	YNTNSDCODS1	YANKTON	605	668
70	VRMLSDCORS1	VERMILLION	605	677
71	SSTNSDCORS6	SISSETON	605	693
72	SXFLSDCO33A	SIOUX FALLS MAIN CG0	605	731
73	CHBLSDCORS1	CHAMBERLAIN	605	734
74	RPCYSDCODS1	RAPID CITY CG1	605	737
75	HRBGSDCORS1	HARRISBURG	605	743
76	PIRRSDCODS6	PIERRE	605	773
77	SXFLSDCODS1	SIOUX FALLS CG1	605	782
78	BLHKSDCERS1	BLACKHAWK	605	787
79	LKPRSDCORS1	LAKE PRESTON	605	847
80	MLLRSDCORS1	MILLER	605	853
81	DESMSDCORS1	DESMET	605	854
82	ORVLMNORRS8	ORTONVILLE	605	862
83	TMLKSDCORS1	TIMBER LAKE	605	865
84	WITWSDCODS0	WATERTOWN	605	882
85	WTTWSDCODS0	WATERTOWN	605	884
86	WTTWSDCODS0	WATERTOWN	605	888
87	BLFRSDCORS1	BELLE FOURCHE	605	892
88	WRWKSDCORS1	WARWICK	605	923
89	PIRRSDCODS6	PIERRE	605	945
90	SXFLSDCODS1	SIOUX FALLS CG1	605	978
91	ARTNSDCORS1	ARLINGTON	605	983
92	CNTNSDCORS1	CANTON	605	987
93	SXFLSDCODS1	SIOUX FALLS CG1	605	988
94	MTCHSDCODS1	MITCHELL	605	995
95	MTCHSDCODS1	MITCHELL	605	996
96	FLNDSDCORS1	FLANDREAU	605	997

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF SOUTH DAKOTA

IN THE MATTER OF THE FCC ORDER) ORDER GRANTING ESTABLISHING NEW DEADLINES FOR) APPROVAL OF CARRIER IMPLEMENTATION OF INTRALATA DIALING) LETTERS PAKITY BY LOCAL EXCHANGE CARRIERS) TC99-030

On March 23, 1999, the Federal Communications Commission (FCC) issued an order establishing new deadlines for implementation of intraLATA dialing parity by local exchange carriers (LECs). In the Matters of Implementation of the Local Competition Provisions of the Telecommunications Act of 1996; Petition of Southwestern Bell Telephone Company, Pacific Bell, and Nevada Bell for Expedited Declaratory Ruling on Interstate IntraLATA Toll Dialing Parity or, in the Alternative, Various Other Relief, CC Docket No. 96-98, FCC 99-54 (released March 23, 1999). The order states that "[n]o later than April 22, 1999, all LECs must file intraLATA toll dialing parity plans with the state regulatory commission for each state in which the LEC provides telephone exchange service if a plan has not yet been filed with such state commission. Once a state commission has approved a plan, the LEC must implement its plan no later than 30 days after the date on which the plan is approved." Id. at ¶ 7. If the state commission has not acted on the plan by June 22, 1999, the LEC must file the plan with the Common Carrier Bureau of the FCC. Id.

At its March 30, 1999, meeting, the Public Utilities Commission (Commission) opened a docket in order to review intraLATA toll dialing plans and established a procedural schedule that would allow other parties to file written comment on the LECs' intraLATA toll dialing plans. At its April 1, 1999, meeting, the Commission issued guidelines for LECs to follow when developing their intraLATA toll dialing plans. On the issue of cost recovery, the Commission decided that if a LEC believes that it needs cost recovery, the LEC should file for cost recovery in a separate proceeding before the Commission in accordance with FCC rules.

On April 23, 1939, the Commission electronically transmitted notice that the following companies had filed intraLATA toll dialing parity plans: Heartland Telecommunications Company of lowa on April 20, 1999; Accent Communications, Inc. on April 20, 1999; Splitrock Properties, Inc. on April 21, 1999; Jefferson Telephone Company on April 21, 1999; Venture Communications, Inc. on April 21, 1999; Hanson County Telephone Company on April 21, 1999; Hanson Communications, Inc. d/b/a McCook Telecom on April 21, 1999; Vivian Telephone Company d/b/a Golden West Communications, Inc. on April 21, 1999; Stockholm Strandburg Telephone Co. on April 22, 1999; AT&T Communications of the Midwest, Inc. on April 22, 1999; Midco Communications on April 22, 1999; Heartland Communications, Inc. on April 22, 1999; Mobridge Telecommunications on April 22, 1999; West River Telecommunications Cooperative on April 22, 1999; Dakota Telecommunications Group, Inc., DTG Communications, Inc. and Dakota Telecom, Inc. on April 22, 1999; Stateline Telecommunications, Inc. on April 22, 1999; and U S WEST Communications, Inc. on April 22, 1999; Stateline Telecommunications, Inc. on April 22, 1999; and U S WEST Communications, Inc. on April 22, 1999; Stateline Telecommunications, Inc. on April 22, 1999; and U S WEST Communications, Inc. on April 22, 1999; Stateline Telecommunications, Inc. on April 22, 1999; and U S WEST Communications, Inc. on April 22, 1999; Stateline Telecommunications, Inc. on April 22, 1999; and U S WEST Communications, Inc. on April 22, 1999; Stateline Telecommunications, Inc. on April 22, 1999; Attes Telecommunications, Inc. on April 22, 1999; Stateline Telecommunications, Inc. on April 22, 1999; and U S WEST Communications, Inc. on April 22, 1999; Stateline Telecommunications, Inc. on April 22, 1999; Attes Telecommunications, Inc. on April 22, 1999; Stateline Teleco

The following local exchange carriers notified the Commission that they have completed conversion to intraLATA dialing parity: Fort Randall Telephone Company on April 21,1999; Mt. Rushmore Telephone Company on April 21, 1999; CommChoice, LLC on April 22, 1999; Kadoka on April 26, 1999; Roberts County Telephone Cooperative Association on May 12, 1999; RC Communications, Inc. on May 12, 1999; Golden West Telecommunications Cooperative, Inc. on May 13, 1999; Sully Buttes Telephone Cooperative, Inc. on I ay 17, 1999; and Great Plains Communications on May 17, 1999.

Dickey Rural Telephone Cooperative, Dickey Rural Communications, Inc. Consolidated Telephone Cooperative and Consolidated Telcom, Inc. formerly known as CTC Communications, Inc. petitioned the Commission for a suspension and modification of the requirement for implementation of intraLATA dialing parity in their service areas until June 30, 2000. Kennebec Telephone Company filed its intraLATA toll dialing parity implementation plan and, pursuant to ARSD 20:10:32:39 and 47 U.S.C. 251(f)(2), a petition for suspension and modification of the requirement for implementing intraLATA dialing parity until September 19, 1999.

Western Telephone Company filed its intraLATA toll dialing parity implementation plan and, pursuant to ARSD 20:10:32:39 and 47 U.S.C. 251(f)(2), a petition for suspension and modification of the requirement for implementing intraLATA dialing parity until September 15, 1999.

Beresford Municipal Telephone Company filed its intraLATA toll dialing parity implementation plan and, pursuant to ARSD 20:10:32:39 and 47 U.S.C. 251(f)(2), a petition for suspension and modification of the requirement for implementing intraLATA dialing parity until September 15, 1999.

SANCOM, Inc. and Valley Cable & Sate ite Communications (VC&S) informed the Commission of their respective intraLATA 1+ plans prior to the FCC order. VC&S will convert to intraLATA 1+ on April 1, 1999, and SANCOM on May 3, 1999.

Heartland Communications Inc., Accent Communications, Inc., Splitrock Properties, Inc., Venture Communications, Inc., Hanson County Telephone Company, Hanson Communications, Inc. d/b/a McCook Telecom, Stockholm Strandburg Telephone Co., Mobridge Telecommunications, Stateline Telecommunications, Inc., Vivian Telephone Company d/b/a Golden West Communications, Inc., Heartland Telecommunications Company of Iowa, Jefferson Telephone Company, DCT & DTI, U S WEST Communications, Inc., and West River Telecommunications Cooperative (McLaughlin exchange) requested Commission approval to send out its carrier notification letters in advance of final Commission action on the proposed plan with the carrier notifications completed by June 1, 1999.

At its regularly scheduled May 12, 1999, meeting, the Commission considered the companies' request to send out carrier letters in advance of final approval of the plans. Staff recommended that the Commission grant approval to send out its carrier notification letter in advance of final Commission action on the proposed plan.

The Commission has jurisdiction over this matter pursuant to SDCL 49-31-81 and the Federal Telecommunications Act of 1996, specifically 47 U.S.C. §§ 251 and 252. After discussion, the Commission voted unanimously to grant approval to send out the carrier notification letters in advance of final Commission action on the proposed intraLATA dialing parity plans. It is therefore

ORDERED, that the above referenced companies that requested early approval have been granted approval to send out the carrier notification letters in advance of final Commission action on the proposed intraLATA dialing parity plans.

Dated at Pierre, South Dakota, this 18th day of May, 1999. CERTIFICATE OF SERVICE BY ORDER OF THE COMMISSION: The undersigned hereby certifies that this document has been served today upon all parties of record in this docket, as liated on the docket varyios list, by facsimile or by first class mail, in property addressed envelopes, with charges precisid thereon. MES A BURG Chairman PAM NELSON, Commissioner (OFFICIAL SEAL) ASKA SCHOENFELDER, Commissione

2

TELEC CONSULTING RESOURCES

909 N. 98th Street, Suite 203 Omaha, NE 68114-2508 (402) 398-0062 FAX (402) 398-0065

RECEIVED

MAY 1 9 1999

May 17, 1999

Mr. Bill Bullard, Executive Director South Dakota Public Utilities Commission State Capitol Building 500 Last Capitol Avenue Pierre, South Dakota 57501 SOUTH DAKOTA PUBLIC UTILITIES COMMISSION 301 S. 13th Street, Suite 401 Lincoln, NE 68508 (402) 441-4315 FAX (402) 441-4317

P.O. Box 858, 1509 Sylvan Circle Brandon, SD 57005-0858 (605) 582-2020 FAX (805) 582-2021

RE: Docket TC99-030/Implementation Plan for IntraLATA Dialing Parity

Dear Mr. Bullard:

On behalf of our client, Jefferson Telephone Company (Jefferson), we are filing an amendment to its intraLATA toll dialing parity implementation plan in the above referenced docket.

Per the recommendations of the South Dakota Public Utilities Commission (SDPUC) staff, we are adding information specifically addressing payphones. This information has been added to item 6.A. of the Plan: Customer notification, Current customers. We have also changed item 6.A. in accordance with the SDPUC staff's recommendation regarding the need for customers who decide to change their intraLATA carrier to contact their carrier of choice. The customer notification (Attachment C) has been amended to reflect this change and the customer response form (Attachment D) has been omitted.

We have enclosed the corrected Plan pages.

Please give Loretta Calabro or me a call at (402)398-0062 with any questions you may have on this filing.

Thank you.

Sincerely,

Lee Darrington enc

cc: Tom Connors, Jefferson Telephone Company

5. Interexchange carrier (carrier) notification:

All carriers certified in South Dakota to provide long listance services will be notified by May 14, 1999, of the conversion to intraLATA toll dialing parity. (Please see Attachment A.) These carriers will be asked to respond by June 7, 1999, if they want to participate in the intraLATA toll presubsciption process. (See Attachment B.)

Jefferson Telephone Company will make available, upon request, preconversion customer name and address lists to participating carriers that meet all requirements for participation in the intraLATA presubsciption process.

6. Customer notification:

A. Current customers:

Customers will be notified of the conversion to intraLATA toll dialing parity by letter by June 25, 1999. (Please see Attachment C.) Included in this letter will be a list of participating carriers. In the letter, customers will be advised that they may remain with their existing intraLATA 1+ carrier or choose a different carrier from the list of participating carriers. Customers will be advised to contact the carrier of their choice when choosing a carrier other than their existing carrier, those customers choosing to stay with their existing carrier. Based on the changes received from participating carriers, Jefferson Telephone Company will execute all necessary carrier selection changes as of July 15, 1999. Customers will not be charged for making any change to their intraLATA 1+ carrier selection during the presubscription process. In addition, customers will be advised that they will be given a 60 day grace period after the implementation date to change their intraLATA 1+ carrier, one time, at no charge. After the 60 day grace period, a one-time \$5.00 charge will apply to such a change, just as it does today for making an interLATA 1+ carrier change. All residence, business, and payphone provider customers will be included in this process.

B. New customers:

New customers applying for local service from Jefferson Telephone Company after June 15, 1999, will be asked to choose both an interLATA and intraLATA carrier. They will be advised that this may or may not be the same carrier and will choose from the respective lists of participating carriers. Lists used by customer service representatives will contain participating carriers' names in random order. Upon customer request, customer service representatives will provide contact telephone numbers for customers to use in contacting carriers. Customers applying for service will be encouraged to make carrier selections and will be advised that neither intraLATA 1+ nor interLATA 1+ calls can be made form their local line until selections are made.

ATTACHMENT C

CUSTOMER NOTICE AND CARRIER LIST

June 15, 1999

Jefferson Telephone Company Customer

Dear Customer:

Currently, Express Communications provides you with 1+ long distance service within the South Dakota calling area. Jefferson Telephone Company will be making changes effective July 15, 1999, that will allow you to choose a different 1+ provider of long distance service for calls within the state. We are including, in this mailing, a list of participating long distance companies that you may choose from.

We will make no change in your service unless we are advised to do so. If you wish to choose a different long distance carrier for calls to points within the state, please contact the carrier of your choice from the enclosed list of participating carriers. This will allow you to subscribe to a long distance plan that specifically fits your needs. The carrier will, in turn, notify us and we will make the change to your service on July 15. If you do nothing, Express Communications will remain your intrastate long distance provider, just as it is today.

Whether or not you make a choice now, there is a 60 day grace period during which time you may decide to change your intraLATA carrier, one time, at no charge. After September 13, 1999, you will incur a \$5.00 charge for changing carriers.

Please call our office at (605)966-5631 if you have any questions on this matter.

Sincerely,

Jefferson Telephone Company

enc.

TELEC CONSULTING RESOURCES &

RECEIVED

MAY 1 9 1999

lay 17, 1999

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION 909 N. 98th Street, Suite 203 Omaha, NE 68114-2508 (402) 398-0062 FAX (402) 398-0065

301 S. 13th Street, Suite 401 Lincoln, NE 68508 (402) 441-4315 FAX (402) 441-4317

P.O. Box 858, 1509 Sylvan Circle Brandon, SD 57005-0858 (605) 582-2020 FAX (605) 582-2021

Mr. Bill Bullard, Executive Director South Dakota Public Utilities Commission State Capitol Building 500 East Capitol Avenue Pierre, South Dakota 57501

RE: Docket TC99-030/Implementation Plan for IntraLATA Dialing Parity

Dear Mr. Bullard:

In response to the recommendation contained in the South Dakota Public Utilities Commission (SDPUC) staff comments on intraLATA dialing parity plans, we are writing on behalf of our clients listed below who were included in the list of non-responding LECs. These companies have already implemented intraLATA dialing parity. These LECs and their respective intraLATA dialing parity implementation dates are:

Three River Telco; Lynch, NE	11-19-98
NebCom, Inc.; Jackson, NE	10-06-98
Bridgewater-Canistota Independent Tel. Co.; Hartford, SD	07-15-98
Union Telephone Company, Hartford, SD	07-15-98
Armour Independent Telephone Company, Hartford, SD	07-15-98
Faith Municipal Telephone Company; Faith, SD	12-10-98

Please give me a call at (402)398-0062 if you have any questions on this matter.

Sincerely,

4 Calabo

Loretta Calabro

cc: Neil Classen, Three River Emory Graffis, NebCom Laurie Freemark, Bridgewater-Canistota, Union, Armour Vivian Miller; Faith



RECEIVED

May 17, 1999

1..... 2.0 1099 SCUTH DAKOTA PUBLIC

Keren E. Cremer, Staff Attorney South Dakota Public Utilities Commission 500 East Capitol Pierre, South Dakota 57501

This lutter is in response to your correspondence of May 10, 1999, regarding STAFF COMMENTS ON INTRALATA TOLL DIALING PARITY PLANS. In your May 10th memo you listed 57 telephone companies that had not filed any plans with the Commission. Although our company was not on the list, I feel I should respond, as we have about 25 South Dakota customers, in what is known as our West Marietta exchange.

Our South Dakota (West Marietta exchange) customers (2%), along with all of our Minnesota customers (98%), have had both INTER-LATA and INTRA-LATA Toll Dialing Parity (Equal Access) since the Spring of 1932. I do not know whether the plan used at that time for our Minnesota customers was also filed with the South Dakota Commission. Whatever the case, our South Dakota customers have had a long list of Inter-exchange Carriers from which to choose their primary IXC for the past 7 years.

If you have any further questions, please feel free to call me at 320-568-2105.

Robert J. Hoffman

Manager J. Hoffman

TC99-030



Martin and Associates, Inc.

CONSULTANTS . PROFESSIONAL ENGINEERS . COMPUTER SPECIALISTS

RECEIVED

MAY 2 0 1999

SOUTH DAKOTA PUBLIC

UTILITIES COMMISSION

Date: May 19, 1999

TO: All Long Distance Carriers of Record in the State of South Dakota

Golden West Communications, Inc. (GWC) is pleased to announce the provisioning of IntraLATA equal access in certain local exchange areas. A list of these exchanges is attached. This service will be made available to customers on July 22, 1999.

It is GWC's intent to work closely with all users of access and maintain an impartial position with regard to the end user's selection of an IntraLATA long distance company. GWC will supply a PIC list for the end user's selection of an IntraLATA long distance company. IntraLATA equal access will be provisioned on an end office basis and therefore interconnection and access may be ordered through Greg Goddicksen, Golden West Communications, Inc., 1510 National Ave., Hot Springs, SD 57747.

Please complete and return the attached form if you wish to be a carrier of choice on the IntraLATA equal access PIC list for the exchanges listed on the next page.

Questions may be directed to Janice Christensen, Equal Access Coordinator at 605-995-2576. Technical questions should be directed to Greg Goddicksen, Inside Plant Supervisor at 605-745-3103.

You must return your request for participation postmarked no later than June 16, 1999, to:

Janice Christensen, Equal Access Coordinator Martin and Associates, Inc. 1515 North Sanborn Boulevard Mitchell, SD 57301-1021 Fax # 605-995-2577

Sincerely, Golden West Communications, Inc.

an Christereen

Janice Christensen, Equal Access Coordinator Martin and Associates, Inc.

cc: Bill Bullard, South Dakota Public Utilities Commission Jack Brown, Golden West Communications, Inc.

TOWN	NPA	NXX
Lesterville, SD	605	364
Marion, SD	605	648
		1

Golden West Communications, Inc. exchanges to provide IntraLATA equal access:

INTRALATA PIC LIST PARTICIPATION FORM FOR GOLDEN WEST COMMUNICATIONS, INC. (Marion & Lesterville)

CARRIER NAME	
ACNA	
CIC	
BILLING ADDRESS	
BILLING CONTACT	
PHONE NUMBER	
FAX NUMBER	
E-MAIL ADDRESS	
CUSTOMER SERVICE NUMBER (BUSINESS)	
CUSTOMER SERVICE NUMBER (RESIDENCE)	
WOULD YOU LIKE TO BE INCLUDED ON THE INTRALATA PIC LIST?	YES
SIGNATURE	
TITLE	
DATE	

Please respond by June 16, 1999.

Fax # 605-995-2577

Address: Janice Christensen, Equal Access Coordinator 1515 North Sanborn Boulevard Mitchell, SD 57301-1021

TC 99-030



Martin and Associates, Inc.

CONSULTANTS . PROFESSIONAL ENGINEERS . COMPUTER SPECIALISTS

RECEIVED

MAY 2 0 1999

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

Date: May 19, 1999

TO: All Long Distance Carriers of Record in the State of South Dakota

Golden West Communications, Inc. (GWC) is pleased to announce the provisioning of IntraLATA equal access in certain local exchange areas. A list of these exchanges is attached. This service will be made available to customers on July 22, 1999.

It is GWC's intent to work closely with all users of access and maintain an impartial position with regard to the end user's selection of an IntraLATA long distance carrier. GWC will supply a PIC list for the end user's selection of an IntraLATA long distance carrier. However, because IntraLATA equal access will be provisioned via South Dakota Network (SDN) at 2900 West 10th Street, Sioux Falls, SD 57104, interconnection and access may be ordered via SDN.

Please complete and return the attached form if you wish to be a carrier of choice on the IntraLATA equal access PIC list for the exchanges listed on the next page.

Questions may be directed to Janice Christensen, Equal Access Coordinator at 605-995-2576. Technical questions should be directed to Greg Goddicksen, Inside Plant Supervisor at 605-745-3103.

You must return your request for participation postmarked no later than June 16, 1999, to:

Janice Christensen, Equal Access Coordinator Martin and Associates, Inc. 1515 North Sanborn Boulevard Mitchell, SD 57301-1021 Fax # 605-995-2577

Sincerely, Golden West Communications, Inc.

hristerner

Janice Christensen, Equal Access Coordinator Martin and Associates, Inc.

ce:

Bill Bullard, South Dakota Public Utilities Commission

1515 NORTH SANBORN BOULEVARD • MITCHELL, SOUTH DAKOTA 573 1-1021 • 605-996-9646 • FAX: 605-995-2577

TOWN	NPA	NXX
So. Bonesteel, NE	402	653
So. Burke, NE	402	774
Gregory, NE	402	974
Avon, SD	605	286
Springfield, SD	605	369
Menno, SD	605	387
Reliance, SD	605	473
Clearfield, SD	1.5	557
Scotland, SD	605	583
Bonesteel, SD	605	654
Murdo, SD	605	669
Custer, SD	605	673
Vivian, SD	605	683
Rosebud. SD	605	747
Burke, SD	605	775
Gregory, SD	605	835
Winner, SD	605	842
Mission, SD	605	856
Witten, SD	605	879
Freeman, SD	605	925

Golden West Communications, Inc. exchanges to provide IntraLATA equal access:

INTRALATA PIC LIST PARTICIPATION FORM FOR GOLDEN WEST COMMUNICATIONS, INC.

CARRIER NAME	
ACNA	
CIC	
BILLING ADDRESS	
BILLING CONTACT	
PHONE NUMBER	
FAX NUMBER	
E-MAIL ADDRESS	
CUSTOMER SERVICE NUMBER (BUSINESS)	
CUSTOMER SERVICE NUMBER (RESIDENCE)	
WOULD YOU LIKE TO BE INCLUDED ON THE INTRALATA PIC LIST?	YES NO
SIGNATURE	
TITLE	
DATE	

Please respond by June 16, 1999.

Address:

Janice Christensen, Equal Access Coordinator 1515 North Sanborn Boulevard Mitchell, SD 57301-1021 Fax # 605-995-2577



RECEIVED

MAY 2 4 1503

May 21, 1999

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

Mr. William Bullard, Jr. Executive Director South Dakota Public Utilities Commission State Capitol 500 East Capital Avenue Pierre, SD 57501-5071

Dear Mr. Bullard:

RE: TC99-030/041/042/043/046/047 INTRALATA TOLL DIALING PARITY PLAN STATEMENT OF SERVICE LETTER FOR LDM SYSTEMS, INC.

This Statement of Service Letter is submitted on behalf of LDM Systems, Inc., a certified competitive local exchange carrier in the state of South Dakota, concerning an intraLATA toll dialing parity plan.

LDM Systems, Inc. is a subsidiary of RSL COM U.S.A., Inc., providing both interexchange telecommunications services and competitive local exchange services in selected states. To date, LDM Systems has NOT begun offering competitive local exchange services in the state of South Dakota. Therefore, I respectfully request a waiver of the filing requirement for its intraLATA toll dialing parity plan at this time. LDM Systems will comply, however, with the mandate of filing this plan prior to offering competitive local exchange services in South Dakota.

If you should require any additional information on this matter, please feel free to contact me at (212) 588-3668.

Sincerely,

David Paries

David Parries Director - Regulatory Affairs

cc: Mr. Kurt Beebe, LDM Systems

430 Park Avenue, Fifth Floor, New York, NY 10022. Telephone: (212) 588-3600 Fax: (212) 588-3601 http://www.rslcomusa.com

TC99-030



Martin and Associates, Inc.

CONSULTANTS . PROFESSIONAL ENGINEERS . COMPUTER SPECIALISTS

RECEIVED

MAY 2 4 1999

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

Date: May 21, 1999

TO: All Long Distance Carriers of Record in the State of South Dakota

Heartland Communications, Inc. (HCI) is pleased to announce the provisioning of IntraLATA equal access in certain local exchange areas. A list of these exchanges is attached. This service will be made available to customers on July 22, 1999.

It is HCTs intent to work closely with all users of access and maintain an impartial position with regard to the end user's selection of an IntraLATA long distance carrier. HCI will supply a PIC list for the end user's selection of an IntraLATA long distance carrier. However, because IntraLATA equal access will be provisioned via South Dakota Network (SDN) at 2900 West 10th Street, Sioux Fails, SD 57104, interconnection and access may be ordered via SDN.

Questions may be directed to Janice Christensen, Equal Access Coordinator at 605-995-2576. Technical questions should be directed to Dale Stanek, Outside Plant Superintendent at 605-778-6221.

You must return your request for participation postmarked no later than June 16, 1999, to:

Janice Christensen, Equal Access Coordinator Martin and Associates, Inc. 1515 North Sanborn Boulevard Mitchell, SD 57301-1021 Fax # 605-995-2577

Sincerely, Heartland Communications, Inc.

Janie Christensen

Janice Christensen, Equal Access Coordinator Martin and Associates, Inc.

CC:

Bill Bullard, South Dakota Fublic Utilities Commission Mark Benton, Heartland Communications, Inc.

TOWN	NPA	NXX
Platte	605	337

Heartland Communications, Inc. exchanges to provide IntraLATA equal access:

INTRALATA PIC LIST PARTICIPATION FORM FOR HEARTLAND COMMUNICATIONS, INC.

CARRIER NAME	
ACNA	
CIC	
BILLING ADDRESS	
BILLING CONTACT	
PHONE NUMBER	
FAX NUMBER	
E-MAIL ADDRESS	
CUSTOMER SERVICE NUMBER (LUSINESS)	
CUSTOMER SERVICE NUMBER (RESIDENCE)	
WOULD YOU LIKE TO BE INCLUDED ON THE INTRALATA PIC LIST?	YES
SIGNATURE	
TITLE	
DATE	

Please respond by June 16, 1°99.

Janice Christensen 1515 N. Sanborn Boulevard Martin and Associates, Inc. Mitchell, SD 57301 Fax: 605-995-2577

Rediver Telecom

May 17, 1999

Dupusty Director Francel Utilizies Drivision South Dakota Public Utilizies Commi State Capitol Building 506 East Capitol Street Fiame, SD 57501-5070

506 Broadway + P.O. Box 136

Abercromble, ND 58001

7099-030

RECEIVED MAY 24 1999

SOUTH DANOTA PUBLIC

RE: IntraLATA Dialing Parity/Equal Access Implementation Plan

custments had sheady been balloard for inserf. ATA equal access by US West. After conducting a proces Bad Biver Telecom, Inc. purchased two exchanges in North Dakota from US West Communications on June 1, 1996. Three customers who live in South Dakota were included in one of the exchanges. These he default carrier in these excha teraLATA equal access on March 1, 1998, in both South Dakota and North Dakota. US West rema I notifying digible carriers and all subscribers of the equal access conversion, we began offer

Assend We feel this meets our company's obligation to fulfill the FCC mandate to implement intraLATA during

carrier manes and tel Weee activated. A separate fast exists for interLATA service carriers and that list is also scrambled each mon or numes and telephone numbers to new customers and also to any current customer who requests. The order in which carriers appear on this list is scrambled each month and a copy of this list is at to con uply with FCC regulations for equal access by providing an up-to-date business list with

Villaough we offer Red River Long Dietunce, we do not openly solicit customers when subscribers call g their long distance service

We mirror the National Enclamage Currier Association (NECA) until of \$5.00 for a intraLATA tecription" charge. A copy of this tariff is enclosed

The cus tunnery \$50.00 faing fee is enclosed. Please contact our office if you have any questions regarding

Sincerely,

Ando on the

Senoral Managor

Heturnel #5000 Chack on 5/24/99.

"For All Your Telecommunications Needs" Phone 701/553-8309 • FAX 701/553-8395 CRW 1-800-414-1879

TELECOM INTERLATA LONG DITANCE PROVIDERS

Coast International, Inc. Customer Service: (800) \$77-1118	Customer Service: (800) 735-3003	Freeder Constantication Services, Inc. Customer Service: (800) 783-2020 American Stancrom	MCI Telecomusculcations Residential Service: (800) 444-3333 Busicess Service: (800) 888-0800	The Phone Company Customer Service: (800) 728-3288	GTE Long Distance, Inc. Residential Service: (800) 343-2092 Buniness Service: (800) 643-8399	Tuerth I, Long Distance Customer Service (800) 286-8241	Customer Service (800) 447-2111 IXC Communicatives Services, Inc. Custo nue Service (800) 848-8459	Cuble & Wirricas (Business Outy) Business Service (800) 486-8686	60 Ø		Residential Service: (800) 275-0100 Business Service: (800) 749-9600	Kessoomiaa Service (800) 222-0400 Baaiaess Service (800) 222-0400 Wearldoom	Customer Service: (800) 998-7378	Customer Service: (800) 473-7378	nuch Amer	Oncore Constructions Customer Service: (300) \$25-5533
		Flease contact carriers when selecting or disconnecting their services, to ensure proper set up, c vreet billing of your service plan and/or 1 onthly free.	Customer Service: (800) 569-4682	Kessionital Service: (800) 789-7027 Buriness Service: (800) 789-7027	Customer Service: (800) 422-1470 Working Assets Long Distance	Autornitisium/Lifeliae Customer Service: (800) 800-7550	Sprint Renidential Service: (800) \$77-4646 Business Service: (800) \$77-4020	UniDial Customer Service: (800) 222-0180	Micans Telecom Costemar Service: (800) 933-1224	Phoenix Network Customer Service: (800) 864-0656	Red River Lang Distance Customer Service: (800) 442-7984 Residential Service: (701) 553-8309	Consolidated Cananavalcation, Inc. Customer Service: (800) 500-8000	US Link Residential Service: (800) 450-7500 Buniness Service: (800) 450-7283	Matrix Telecons Customer Service: (800) 252-0242	Bell Atlantic Consensations, Inc. Residential Service: (800) 556-2355 Business Service: (800) 636-2355	Eclipse Telecommendations Customer Service: (800) 422-1199

Service: (877) 742-5384

DUL

TELECOM INTRALATA LONG DISTANCE PROVIDERS

Coast International, Inc. Centenner Service: (200) \$77-1115	Teach America Container Service: (800) \$23-7777	GTE Long Distance, Inc. Residential Service: (800) 343-2092 Business Service: (800) 643-8399	Sprint Residential Service: (800) 877-4646 Business Service: (800) 877-4020	UniDital Customer Service: (300) 223-0150	Consolidated Communication, Inc. Customer Service: (200) 500-5000		American Sharecom	MCI Telecommendications Residential Service: (800) 444-3333 Brainess Service: (800) 888-0800	Ouestar Lang Distunce Customer Service: (800) 473-7378	Working Assets Long Distance Residential Service: (800) 783-0898 Business Service: (800) 789-7027	Oncore Communications Customer Service: (\$00) \$25-5533	Phoenix Network Customer Service: (800) 864-0656	NTC Long Distance Customer Service: (800) 569-4682	Freather Consemnational Services, Inc. Customer Service: (800) 783-2020	US Link Residential Service: (800) 450-7500 Business Service: (800) 450-7283	ATAT Residential Service: (800) 222-0300 Business Service: (800) 222-0400	Müdeene Communications Customer Service: (800) 998-7378
		Flease contact carriers when selecting or disconnecting their services, to ensure proper set up, correct billing of your service plan and/or monthly feex.	Meetre Link Customer Service: (800) 422-1470	Westinghouse Communications Customer Service: (800) 447-2111	DTT Customar Service: (877) 742-5384	Mastrix Telecom Customer Service: (800) 282-0242	Customer Service: (809) 422-1199	Custom	Excel Customer Service: (800) \$75-9235	Landen Telecom Network Customer Service: (800) 950-3015	Worldcom Residential Service: (200) 275-0100 Business Service: (200) 749-9600	DKC Companyications Services, Inc. Customer Service: (800) 848-8459	The Phase Company Customer Service: (800) 728-3288	Bell Atlantic Convenantications, Inc. Residential Service: (800) 556-2355 Buniacos Service: (800) 636-2355	Wireless (Bu Business	Red River Lang Distance Customer Service: (800) 442-7984 Residential Service: (701) 553-8309	Menns Telenn Cuntomer Service: (800) 933-1224

MATIONAL EXCHANGE CARRIER ASSOCIATION, INC.

TARIFF F.C.C. NO. 5 12th Revised Page 17-37 Cancels 11th Revised Page 17-37

(T)

ACCESS SERVICE

17. Rates and Charges (Cont'd)

17.4 Other Services (Cont'd)

17.4.4 Miscellaneous Services (Cont'd)

(G) <u>Telecommunications Service Priority</u>

		Nonrecurring Charge	Tariff Section Reference	
	Per service arranged	\$54.63	13.3.3	
(H)	Controller Arrangement	Monthly Rate		
	Fer Arrangement	\$100.00	13.3.4 (A)	
(I)	Fresubscription			
		Monrecurring Charge		
	Per Telephone Exchange Service line or trunk*	\$ 5.00	13.4	
(J)	Unauthorized PIC Change			
	- Residence/Business Per Telephone Exchange Service line or trunk	\$35.65	13.6	
	 Per Pay Telephone Exchange Service line or trunk 	\$57.57	13.6	

This charge is generally billed to the end user who is the subscriber to the Telephone Exchange Service. In those instances where the IC both requests the presubscription change, and requests the associated charge be billed to it, the Telephone Company will bill the IC. In the event an end user is incorrectly presubscribed due to misassignment on the part of the Telephone Company, no charge shall apply. In the event an end user is incorrectly presubscribed due to misassignment on the part of the IC, and the IC is unable to document such an assignment, the Telephone Company will apply the charge to the IC responsible for the misassignment of the end user and assign the end user to an IC of the end user's choice.

Issued: October 2, 1997

Effective: October 17, 1997

Director - Access Tariffs 100 So. Jefferson Road, Whippany, NJ 07981

TC99-030



Martin and Associates, Inc.

CONSULTANTS . PROFESSIONAL ENGINEERS . COMPUTER SPECIALISTS

RECEIVED

MAY 2 6 1999 SOUTH DAKOTA PUBLIC

UTILITIES COMMISSION

Date: May 25, 1999

TO: All Long Distance Carriers of Record in the State of South Dakota

Mobridge Telecommunications Co. (MTC) is pleased to announce the provisioning of intraLATA equal access in certain local exchange areas. A list of these exchanges is attached. This service will be made available to customers on July 22, 1999.

It is MTC's intent to work closely with all users of access and maintain an impartial position with regard to the end user's selection of an IntraLATA long distance carrier. MTC will supply a PIC list for the end user's selection of an IntraLATA long distance carrier. However, because intraLATA equal access will be provisioned via South Dakota Network (SDN) at 2900 West 10th Street, Sioux Falls, SD 57104, interconnection and access may be ordered via SDN.

Questions may be directed to Janice Christensen, Equal Access Coordinator at 605-995-2576. Technical questions should be directed to Blaine L. Lenser, Plant Manager at 701-748-2211.

You must return your request for participation postmarked no later than June 16. 1999. to:

Janice Christensen, Equal Access Coordinator Martin and Associates. Inc. 1515 North Sanborn Boulevard Mitchell, SD 57301-1021 Fax # 605-995-2577

Sincerely, Mobridge Telecommunications Co.

resteres

Janice Christensen, Equal Access Coordinator Martin and Associates, Inc.

cc: Bill Bullard, South Dakota Public Utilities Commission Robert Barfield, Mobridge Telecommunications Co. Mobridge Telecom Co. exchanges to provide IntraLATA equal access:

NPA	NXX
605	845
	NPA 605

INTRALATA PIC LIST PARTICIPATION FORM FOR MOBRIDGE TELECOM. CO.

CARRIER NAME	
ACNA	
CIC	
BILLING ADDRESS	
BILLING CONTACT	
PHONE NUMBER	-
FAX NUMBER	
E-MAIL ADDRESS	
CUSTOMER SERVICE NUMBER (BUSINESS)	
CUSTOMER SERVICE NUMBER (RESIDENCE)	
WOULD YOU LIKE TO BE INCLUDED ON THE INTRALATA PIC LIST?	YES NO
SIGNATURE	
TTILE	
DATE	

Please respond by June 16, 1999.

Janice Christensen 1515 N. Sanborn Boulevard Martin and Associates, Inc. Mitchell, SD 57301 Fax: 605-995-2577

TC99-030



Martin and Associates, Inc.

CONSULTANTS . PROFESSIONAL ENGINEERS . COMPUTER SPECIALISTS

RECEIVED

MAY 2 6 1999

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

Date: May 25, 1999

TO: All Long Distance Carriers of Record in the State of South Dakota

West River Telecommunications Cooperative (WRTC) is pleased to announce the provisioning of intraLATA equal access in certain local exchange areas. A list of these exchanges is attached. This service will be made available to customers on July 22, 1999.

It is WRTC's intent to work closely with all users of access and maintain an impartial position with regard to the end user's selection of an IntraLATA long distance carrier. WRTC will supply a PIC list for the end user's selection of an IntraLATA long distance carrier. IntraLATA equal access will be provisioned on an end office basis and therefore interconnection and access may be ordered through West River Telecommunications Cooperative.

Questions may be directed to Janice Christensen, Equal Access Coordinator at 605-995-2576. Technical questions should be directed to Blaine L. Lemer, Plant Manager at 701-748-2211.

You must return your request for participation postmarked no later than June 16, 1999, to:

Janice Christensen, Equal Access Coordinator Martin and Associates, Inc. 1515 North Sanborn Boulevard Mitchell, SD 57301-1021 Fax # 605-995-2577

Sincerely, West River Telecommuncations Cooperative

Janue Chustensen

Janice Christensen, Equal Access Coordinator Martin and Associates, Inc.

cc:

Bill Bullard, South Dakota Public Utilities Commission Robert Barfield, West River Telecommuncations Cooperative

TOWN	NPA	NXX
McLaughlin	605	823
McLaughlin	701	827

West River Telecommuncations Cooperative exchanges to provide IntraLATA equal access:

INTRALATA PIC LIST PARTICIPATION FORM FOR WEST RIVER TELECOMMUNICATIONS COOPERATIVE

CARRIER NAME	
ACNA	
CIC	
BILLING ADDRESS	
BILLING CONTACT	
PHONE NUMBER	
FAX NUMBER	
E-MAIL ADDRESS	
CUSTOMER SERVICE NUMBER (BUSINESS)	
CUSTOMER SERVICE NUMBER (RESIDENCE)	
WOULD YOU LIKE TO BE INCLUDED ON THE INTRALATA PIC LIST?	YES NO
SIGNATURE	
TITLE	
DATE	

Please respond by June 16, 1999.

Janice Christensen 1515 N. Sanborn Boulevard Martin and Associates, Inc. Mitchell, SD 57301 Fax: 605-995-2577



Michel L. Singer Attorney

Mr. Bill Bullard

Executive Director

Via Overnight Delivery

SD Public Service Commission 500 East Capital Avenue

5/25/1999

Room 1575 1875 Lawrence Street Denver, CO 80202 303 298-6527

RECEIVED

MAY 2 6 1999

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

Pierre, SD 57501

Re: Implementation of Dialing Parity, Docket No. TC99-030

Dear Mr. Bullard:

Enclosed for filing on behalf of AT&T Communications of the Midwest Inc. is an original and 10 copies of AT&T's Petition for Commission Approval of Carrier Notification Letter.

Please feel free to call me if there are any questions.

Sincerely, Michel L. Singer

Enclosures

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF SOUTH DAKOTA

IN THE MATTER OF THE FCC ORDER ESTABLISHING NEW DEADLINES FOR IMPLEMENTATION OF INTRALATA DIALING PARITY BY LOCAL EXCHANGE CARRIERS

DOCKET NO. TC99-030

AT&T'S PETITION FOR COMMISSION APPROVAL OF CARRIER NOTIFICATION LETTER

AT&T Communications of the Midwest, Inc. ("AT&T") hereby submits this petition for approval of its carrier notification letter in advance of the South Dakota Public Utilities Commission's ("Commission") action on AT&T's Digital Link Dialing Parity Implementation Plan ("Plan") filed on April 22, 1999. In support of its petition, AT&T states as follows:

 The FCC has ordered that once a state commission has approved a toll dialing parity implementation plan, the local exchange carrier must implement its plan no later than thirty (30) days after the date on which the plan is approved.¹

2. In order to allow adequate time to mail the carrier notifications, receive responses from interested carriers, and prepare a list of long distance providers to include with the customer notification letter as recommended by Staff, AT&T will need to send out carrier notifications prior to the Commission's approval of AT&T's Plan.

¹ In the Matters of Implementation of the Local Competition Provisions of the Telecommunications Act of 1996; Petition of Southwestern Bell, and Nevada Bell for Expedited Declaratory Ruling of Interstate At its regularly scheduled meeting on May i2, 1999, the Commission considered and granted requests from several carriers to send out carrier notification letters in advance of final Commission action on the proposed intraLATA dialing parity plans. An Order regarding the same was issued May 18, 1999.

WHEREFORE, AT&T respectfully requests that the Commission grant AT&T's petition for Commission approval to send out carrier notification letters in advance of Commission approval of AT&T's Plan.

Dated this 25th day of May, 1999.

AT&T COMMUNICATIONS OF THE MIDWEST, INC.

Maria Arias Chapleau Michel Singer 1875 Lawrence Street, Suite 1575 Denver, CO 80202 (303) 298-6527 (303) 298-6301 (Facsimile)

ATTORNEYS FOR AT&T COMMUNICATIONS OF THE MIDWEST, INC.

IntraLATA Toll Dioling Parity or, in the Alternative, Various Other Relief, CC Docket No. 96-98, FCC 99-54 (Released March 23, 1999).

TC99-030



Martin and Associates, Inc.

CONSULTANTS . PROFESSIONAL ENGINEERS . COMPUTER SPECIALISTS

RECEIVED

MAY 27 1999 SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

Date May 26, 1999

TO: All Long Distance Carriers of Record in the State of South Dakota

Stockholm-Strandburg Telephone Co. (Stockholm-Strandburg) is pleased to announce the provisioning of IntraLATA equal access in certain local exchange areas. A list of these exchanges is attached. This service will be made available to customers on July 22, 1999.

It is Stockholm-Strandburg's intent to work closely with all users of access and maintain an impartial position with regard to the end user's selection of an IntraLATA long distance carrier. Stockholm-Strandburg will supply a PIC list for the end user's selection of an IntraLATA long distance carrier. However, because IntraLATA equal access will be provisioned via South Dakota Network (SDN) at 2900 West 10th Street, Sioux Falls, SD 57104, interconnection and access may be ordered via SDN.

Please complete and return the attached form if you wish to be a carrier of choice on the IntraLATA equal access PIC list for the exchanges listed on the next page.

Questions may be directed to Jan Christensen at Martin and Associates, Inc., 605-995-2576. Technical questions may be directed to Tim Nowick at Stockholm-Strandburg Telephone Co., 605-676-2311.

You must return your request for participation postmarked no later than June 16, 1999, to:

Janice Christensen Martin and Associates, Inc. 1515 N. Sanborn Boulevard Mitchell, SD 57301 Fax: 605-995-2577

Sircerely, Stockholm-Strandburg Telephone Co.

Janice Christensen

 Janice Christensen, Equal Access Coordinator Martin and Associates, Inc.

cc:

Bill Bullard, South Dakota Public Utilities Commission Harold Nowick, Stockholm-Strandburg Telephone Co.

TOWN	NPA	NXX
Revillo	605	623
South Shore	605	756
Stockholm	605	676

Stockholm-Strandburg Telephone Co. exchanges to provide IntraLATA equal access:

INTRALATA PIC LIST PARTICIPATION FORM FOR STOCKHOLM-STRANDBURG TELEPHONE CO.

YES NO

Please respond by June 16, 1999.

Janice Christensen Martin and Associates, Inc. 1515 N. Sanborn Boulevard Mitchell, SD 57301 Fax: 605-995-2577 RT

Communications P.O. Box 506 130 So. 9th

Worland, Wyoming 82401



May 24, 1999

RECEIVED

William Bullard, Executive Director South Dakota Public Utilities Commission 500 East Capitol Pierre, S.D. 57501

JUN 0 1 1999

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

RE: IntraLATA Toll Dialing Parity

Dear Mr. Bullard:

This letter is in response to the South Dakota Public Utilities Commission (SDPUC) meeting of May 7, 1999 requesting IntraLATA toll dialing parity plans.

RT Communications advises the SDPUC that IntraLATA toll dialing parity became effective December 16, 1997 for those customers of RT Communications located in the state of South Dakota and falling under the jurisdiction of the SDPUC.

Sincerely,

Darren D. Moser Controller

DDM/cas



RECEIVED

JUN 0 1 1999

Date May 28, 1999

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

To: All Long Distance Carriers of Record in the State of South Dakota

Venture Communications, Inc. is pleased to announce the provisioning of IntraLATA equal access in certain local exchange areas. A list of these exchanges is attached. This service will be made available to customers on July 22, 1999.

It is Venture Communications, Inc.'s intent to work closely with all users of access and maintain an impartial position with regard to the end user's selection of an IntraLATA long distance carrier. Venture Communications will supply a PIC list for the end user's selection of an IntraLATA long distance carrier. However, because IntraLATA equal access will be provisioned via South Dakota Network (SDN) at 2900 West 10th Street, Sioux Falls, SD 57104, interconnection and access service requests may be ordered via SDN.

Please complete and return the attached form if you wish to be a carrier of choice on the IntraLATA equal access PIC list for the exchanges listed on the next page.

Questions may be directed to Chuck Fejfar at 800-247-1442.

You must return your request for participation postmarked no later than June 16, 1999, to:

Chuck Fejfar South Dakota Network 2900 West 10th St. Sioux Falls, SD 57104 FAX # 605-334-4782

A carbon copy of this request should be sent to:

Janice Volek Venture Communications, Inc. PO Box 476 Highmore, SD 57345 Phone # 605-852-2224 FAX # 605-852-2404

Sincerely,

VENTURE COMMUNICATIONS, INC.

Ranoy Houdek General Manager

ce: Bill Bullard, South Dakota Public Utilities Commission

218 Commercial Avenue S.E. • P.O. Box 157 • Highmore, South Dakota 57345-0157 (605) 852-2224 • FAX (605) 852-2404

TOWN	NPA	NXX
North Britton	701	443
Britton	605	448
Bowdle	605	285
Gettysburg	605	765
Lebanon	605	768
Ouida	605	258
Pierpont	605	325
Roscoe	605	287
Rosiyn	605	486
Selby	605	649
Wessington Springs	605	539

Venture Communications, Inc. exchanges to provide IntraLATA equal access:

INTRALATA PIC LIST PARTICIPATION FORM FOR VENTURE COMMUNICATIONS, INC.

CARRIER NAME	
ACNA	
CIC	
BILLING ADDRESS	
BILLING CONTACT	
PHONE NUMBER	
FAX NUMBER	
E-MAIL ADDRESS	
CUSTOMER SERVICE NUMBER (BUSINESS)	
CUSTOMER SERVICE NUMBER (RESIDENCE)	
WOULD YOU LIKE TO BE INCLUDED ON THE INTRALATA PIC LIST?	YES NO
SIGNATURE	
TITLE	
DATE	

Please respond by June 16, 1999.

To: Chuck Fejfar South Dakota Network 2900 West 10th St. Sioux Falls, SD 57104 FAX # 605-334-4782 Carbon Copy to: Janice Volek Venture Communications, Inc. PO Box 476 Highmore, SD 57345 FAX # 605-852-2404



Martin and Associates, Inc.

CONSULTANTS . PROFESSIONAL ENGINEERS . COMPUTER SPECIALISTS

RECEIVED

JUN 0 1 1999

SOUTH DAKOTA PUBLIC

UTILITIES COMMISSION

Date: May 28, 1999

TO: All Long Distance Carriers of Record in the State of South Dakota

Splitrock Properties, Inc. is pleased to announce the provisioning of IntraLATA equal access in certain local exchange areas. A list of these exchanges is attached. This service will be made available to customers on July 22, 1999.

It is Splitrock Properties, Inc.'s intent to work closely with all users of access and maintain an in partial position with regard to the end user's selection of an IntraLATA long distance carrier. Splitrock Properties, Inc. will supply a PIC list for the end user's selection of an IntraLATA long distance carrier. However, because IntraLATA equal access will be provisioned via South Dakota Network (SDN) at 2900 West 10th Street, Sioux Falls, SD 57104, interconnection and access may be ordered via SDN.

Please complete and return the attached form if you wish to be a carrier of choice on the IntraLATA equal access PIC list for the exchanges listed on the next page.

Questions may be directed to Don Snyders at 605-594-3411.

You must return your request for participation postmarked no later than June 16, 1999, to:

Don Lee, Equal Access Coordinator Martin and Associates, Inc. 1515 North Sanborn Boulevard Mitchell, SD 57301-1021 Fax # 605-995-2577

Sincerely, Splitrock Properties, Inc.

Don Ree (st)

Don Lee, Equal Access Coordinator Martin and Associat s. Inc.

cc:

Bill Bullard, South Dakota Public Utilities Commission Don Snyders, Manager - Splitrock Properties, Inc.

Splitrock Properties, Inc. exchanges to provide IntraLATA equal access:

TOWN	NPA	NXX
Howard/Carthage	605	772
Oldham/Ramona	605	482

INTRALATA PIC LIST PARTICIPATION FORM FOR SPLITROCK PROPERTIES, INC.

CARRIER NAME	
ACNA	
CIC	
BILLING ADDRESS	
BILLING CONTACT	
PHONE NUMBER	
FAX NUMBER	
E-MAIL ADDRESS	
CUSTOMER SERVICE NUMBER (BUSINESS)	
CUSTOMER SERVICE NUMBER (RESIDENCE)	
WOULD YOU LIKE TO BE INCLUDED ON THE INTRALATA PIC LIST?	YES
SIGNATURE	
TITLE	
DATE	

Please respond by June 16, 1999.

Address: Don Lee, Equal Access Coordinator 1515 North Sanborn Boulevard Mitchell, SD 57301-1021 Fax # 605-995-2577 525 East Fourth Street P. O. Box 98 Dell Rapids, SD 57022



(605) 428-5421 1 (800) 952-3566 Fax (605) 428-3132

June 2, 1999

RECEIVED

JUN 0 4 1999

Bill Bullard Executive Director South Dakota Public Utilities Commission 500 E. Capitol Pierre, SD 57501

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

RE: SIOUX VALLEY TELEPHONE INTRALATA TOLL DIALING PARITY

Dear Mr. Bullard.

This letter is to inform the South Dakota Public Utilities Commission that Sioux Valley Telephone Company is currently providing IntraLATA Toll Dialing Parity.

Sioux Valley Telephone Company has provided customers with IntraLATA Toll Dialing Parity since April, 1992.

Consequently. Sioux Valley Telephone Company will not file an IntraLATA Toll Dialing Parity plan with the South Dakota Public Utilities Commission.

Please contact me if you have any questions.

SINCERELY TELEPHONE COMPANY

Dennis Law General Manager

CC: SDPUC File 6.2.99

HEARTLAND TELECOMMUNICATIONS COMPANY of Iowa

June 3, 1999

Mr. 'Villiam Bullard, Executive Director South Dakota Public Utilities Commission 500 East Capitol Pierre, SD 57501

RECEIVED

REF: TC-99-030

JUN 0 7 1393 SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

Dear Mr. Bullard:

This letter is to clarify the South Dakota customers that will be impacted by the Heartland IntraLata Dialing Parity Plan. Our South Dakota cities include approximately 250 customers in adjacent portions of exchanges in Iowa. The area codes and prefixes of the specific cities effected are West Hawarden (605-547) and West Akron (605-565).

The carrier notification letter did not include this information but rather included industry technical information familiar to carriers.

I respectfully request this plan retain the original requested approval date of June 22, 1999. This time will allow Heartland to finalize a marketing plan and complete the necessary switch conversions.

Please call me at (507) 387-1728 with any questions.

Sincerely.

Patricia Burt

Patricia Burt Tariff Analyst Heartland Telecommunications Company of Iowa

221 E. HECKORY ST. P.O. BOX 3248 MANKATO, MN 58002-3248

1-800-752-4486 FAX 507-387-6778



South Dakota Independent Telephone Coalition, Inc.

> Richard D. Colt Executive Director realite@al.cyberner.aut

June 10, 1999

RECEIVED

Rolayne Ailts-Wiest, Commission Counsel South Dakota Public Utilities Commission 500 East Capitol Ave. State Capitol Building Pierre, South Dakota 57501

JUN 1 0 1999

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

RE: Docket TC99-030 (IntraLATA Dialing Parity Plans)

Dear Rolayne:

This letter is written on behalf of the SDITC member LECs that have filed IntraLATA Dialing Parity Plans to respond to your questions raised at the Commission meeting on June 8, 1999. The responses provided are based on my inquiries with consultants for the SDITC member companies and several company managers.

Each question asked at the meeting with the corresponding SDITC response is set forth below:

<u>Question 1</u>: Are directory assistance calls also subject to the customer's preferred carrier selection or "PIC"?

<u>Response</u>: Yes, directory assistance calls including any directory assistance calls dialed as 1+ calls will follow the customer's preferred carrier selection. The preferred carrier is held responsible for the proper routing of such calls.

<u>Question 2</u>: Can LECs accept requests directly from end user customers to make a change in their preferred carrier selection?

<u>Response</u>: Paragraph 92 of the FCC's Second Report and Order in CC Docket 94-129, adopting new anti-slamming rules, indicates that the rules should not be interpreted to prohibit LECs, in all cases, from directly accepting requests from customers to change their preferred interexchange carrier. That paragraph states:

We note that in situations in which a customer initiates or changes long distance service by contacting the LEC directly, verification of the customer's choice would not need to be verified by either the LEC or the chosen IXC. In this situation, neither the LEC nor the



207 E. Capitol Ave., Ste. 206 @ P.O. Box 57 @ Pierre, SD 57501 @ Ph: 605/224-7629 @ Fax 605/224-1637

IXC is the submitting carrier as we have defined it. The LEC is not providing interexchange service to that subscriber. The IXC has not made any requests – it has merely been chosen by the consumer. Furthermore, because the subscriber has personally requested the change from the executing carrier, the IXC is not requesting a change on the subscriber's behalf. If a LEC's actions in this situation resulted in the subscriber being assigned to a different interexchange carrier than the one originally chosen by the subscriber, however, then that LEC could be liable for violations of its duties as an executing carrier.

Based on the above language, it appears that LECs may legally accept requests directly from end user customers to change their preferred IXC. With respect to such requests, however, the actual response of individual LECs may vary. Some LECs, as a precautionary measure, may simply provide a toll free number for the IXC selected and, prior to making the preferred carrier change, insist upon receiving a letter of agency from that IXC. Other LECs, upon receiving the carrier change request, may proceed to execute the carrier change, but will also refer the customer to their selected IXC so that the customer can choose a calling plan.

<u>Ouestion 3</u>: Are LECs extending any preferred carrier freezes requested by customers for interLATA long distance as a freeze for intraLATA carrier purposes?

<u>Response</u>: To my knowledge, none of the SDITC member LECs have taken this sort of action. SDITC does not believe such action would be consistent with the FCC rules which require separate authorizations for both interLATA and intraLATA PIC freezes.

I hope that the above responses adequately address the questions asked. If not, or if there are any other questions, please feel free to give me a call.

Sincerely,

Executive Director and General Counsel

CC:

SDITC member LECs that have filed Dialing Parity Plans



410 South Phillips Avenue Sioux Falls, South Dakota 57104-6824 605:334-1200 * Fax: 605/339-4419

June 9, 1999

Mr. Bill Bullard Executive Director South Dakota Public Utilities Commission 500 East Capitol Avenue Pierre, SD 57501 JUN 1 1 1999

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

RE: Midcontinent Communications Dialing Parity Plan (TC99-030)

Dear Bill:

Please find enclosed the original and ten copies of an <u>amended</u> dialing parity plan for Midcontinent Communications, as ordered under TC99-030. For your reference, we have included modifications to the original plan for comparison purposes as well as a final draft of the plan with associated letters to customers and carriers.

In answer to staff comments, we have:

- attempted to make the customer notification letter more friendly and less technical,
- asked the customer to contact the intraLATA long distance carrier directly and we eliminated the customer response section in the customer notification letter,
- clarified PIC charges at \$5.00 per change effective 60 days after the implementation of this plan,
- 4. included a list of "Carriers of Record" with their respective toll free numbers, and
- addressed the issue of payphones in the plan. Midcontinent currently has no payphone customers, but will certainly extend equal access choice to any payphone customers in the future.

Please let us know if these changes are acceptable to staff.

Sincerely, Midcontinent Communications

W. Tom Simmons Vice President and General Manager

Fifty Years of Service

Modified Original Plan

Changes are noted by strikethrough for deletions, and underscore for additions for comparison purposes.

RECEIVED

JUN 1 1 1999

BEFORE THE PUBLIC UTILITIES COMMISSISON OF THE STATE OF SOUTH DAKOTA

۱

)

)

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE FCC ORDER ESTABLISHING NEW DEADLINES FOR IMPLEMENTATION OF INTRALATA DIALING PARITY BY LOCAL EXCHANGE CARRIERS

TC99-030 MIDCO COMMUNICATIONS INTRALATA TOLL DIALING PLAN

Pursuant to the Order of the South Dakota Public Utilities Commission, Midco Communications hereby submits this intraLATA toll dialing plan for Commission review and approval, according to the guidelines ordered April 2, 1999:

 a description of how the LEC will offer dialing parity for each exchange and its proposed time schedule;

Currently, Midco Communications provides local exchange service only as a reseller of US West services under an approved agreement on file with the South Dakota Public Utilities Commission. Midco's ability to offer dialing parity depends in large part on the dialing parity plan developed by US West. Subject to coordination with the US West plan, Midco intends to support intraLATA dialing parity in the same manner it currently supports interLATA dialing parity in each US West exchange.

Midco Communications also intends to provide facilities based local service in selected US West exchanges. The details of providing that service is contained in an interconnection agreement between Midco Communications, Inc. and US West, Inc., pending approval of the South Dakota Public Utilities Commission (Docket TC99-023). Section 11 of the Agreement addresses dialing parity, offering the full two-PIC option in conformance with Section 271 of the Telecommunications Act. The Agreement also guarantees that for resale, or when Port/Switching Services are provided by US West, any end-user will be able to access the Midco network for services using the same dialing protocol that the end user would use to access the same service on the US West network.

2) a proposal for timely notification of its subscribers and the methods it proposes to use to enable subscribers to select an intraLATA toll provider, including the language the LEC proposes to use in its customer notification letter. The proposals shall include notification to current customers and new customers who join the network after the implementation of dialing parity;

Within thirty days following the approval of this plan. Midco Communications will notify current customers, including payphone service providers, of options to select an intraLATA toll provider through a "Customer Nc fication Letter". Customers who choose a carrier other than their current carrier will be advised to contact the carrier they've chosen to initiate the change. Customers choosing to stay with their current intraLATA carrier will not have to take any action. The "Customer Notification Letter" will include a list of intraLATA carriers in addition to the existing 1+ carrier that have indicated a desire to participate in the intraLATA toll presubscription process. The specific language of the "Customer Notification Letter" follows as Exhibit A. Additionally, within thirty days following the approval of this plan, Midco Communications will modify its Letter of Authorization (LOA) to confirm the customers choice of providers for: 1) Local

exchange service. 2) IntraLATA toll, and 3) IntroLATA toll service. The specific language of follows as Exhibit B.

Customers will be advised that they can change their intraLATA 1+ carrier during the first 60 days following the intraLATA toll dialing parity implementation. presubscription process without charge. After that date, \$5.00 per change will be charged.

 a LEC that is not a BOC must identify the LATA with which it will associate for the purposes of providing intraLATA and interLATA toll dialing parity;

In all cases, Midco Communications is associated with LATA 640, NPA 605.

a description of how carriers will be informed of the implementation process and schedule and how carriers may participate in the process;
 Midco Communications will notify all long distance carriers of record in the State of South Dakota of its implementation process and schedule through a letter.
 The specific language follows as Exhibit C.

 a description of how the LEC's business office will handle requests to change carriers.

Requests to change carriers will be handled by the central processing department, Carriers must send or fax a completed PIC Change Request Form. A sample follows as Exhibit D.

Dated this 21st day of April, 1999.

Respectfully submitted,

W. Tom Simmons Vice President & General Manager Midco Communications, Inc. 410 South Phillips Avenue Sioux Fails, SD 57104 Telephone (605) 334-1200

Exhibit A

Customer Notification Letter

Thank you for choosing Midco Communications as your provider for local exchange telephone services. Effective July 22, 1999, we are offering you the opportunity to select in-state long distance service from various long distance companies. In keeping with the provisions of Section 251 (b)(3) the Telecommunic tions Act of 1996, Midso Communications is required to inform you that you have a choice in selecting providers of intraLATA (in state long distance) and interLATA (out of state long distance) providers. Currently, your in-state long distance carrier is Midcontinent Communications. We will continue to provide this service unless you choose another carrier. If you do nothing, your in-state long distance long distance service will continue as usual with Midcontinent Communications. Your choice may include Midcontinent Communications, or any other long distance carrier of record in the state of South Dakota who have indicated a desire to be a carrier of choice on the IntraLATA PIC list. Those carriers who have agreed to provide 1+ in-state long distance service are listed in the attached notice.

If you wish to make a change in carriers, you must contact the long distance company that you've chosen to order their service. They will contact us to complete the change.

Should you choose to make a change of in-state long distance carriers between now and September 22, 1999, there will be no charges for the change. After September 22, 1999, a \$5.00 charge per change will appear on your bill.

Please confirm your choices for telephone service providers below by indicating the name of the provider along with your signature and the date:

My local exchange provider is:

Midco Communications

By

Date:

Date:

Date:

By

By

My IntraLATA (in state long distance provider is:

My InterLATA (out of state long distance provider is:

If the confirmation of providers above represents a change in providers, <u>you will not be</u> charged for changes made prior to September 22, 1999. After September 22, 1999, you will be charged \$5.00 for each change made.

If you have questions, please do not hesitate to call our customer service department at 605-334-1200 or 1-800-888-1300.

Sincerely, Midco Communications

W. Tom Simmons Vice President & General Manager

EXHIBIT B

Date:____

Company Name:_____

4 4 4	
Address:	
1001000.	

City.	State,	Zip:		

Phone:_____

Midco Communications, Inc. 410 South Phillips Avenue Sioux Falls, SD 57104-6824

Dear Midco Communications:

This letter authorizes Midco Communications, Inc., to act as our local exchange carrier. I understand that we have a choice in selecting providers of intraLATA (in state long distance) and interLATA (out of state long distance) services. The choice may include Midco Communications, or any other long distance carrier of record in the state of South Dakota who have indicated a desire to be a carrier of choice on the IntraLATA/InterLATA PIC lists.

My IntraLATA (in state long distance) provider is: My InterLATA (out of state long distance) provider is:

By_____

By____

Date:

Date:

We authorize Midco to make appropriate changes for all lines at the address listed above, and understand and agree to any charges that may be incurred for changing lines and PIC's to Midco or other choices indicated above.

Sincerely,

(Company representative)

Date:

EXHIBIT C

Month 00, 1999

To: All Long Distance Carriers of Record In the State of South Dakota

Per the requirements of Section 251(b)(3) of the Telecommunications Act of 1996, Midco Communications announces provisioning of IntraLATA and InterLATA equal access and dialing parity in the following South Dakota exchanges:

TBA

Midco Communications will work closely with all carriers of record expressing an interest to be a carrier of choice. If you are interested in receiving a copy of our manual, which details ordering procedures, terms and conditions for the provision of Feature Group D, Switched Access Service, and provides the required forms and time tables, please complete and return or fax the enclosed request form to:

> Sharon Stettnichs Manager – Central Processing Midco Communications 410 South Phillips Avenue Sioux Falls, SD 57104-6824 Fax: (605) 357-5423

If you have quastions, you may contact Sharon Stettnichs at (605) 334-1200.

Sincerely, Midco Communications

W. Tom Simmons Vice President & General Manager



REQUEST FORM IntraLATA/interLATA Equal Access and Dialing Parity Manual

To: Sharon Stettnichs Manager – Central Processing Midco Communications, Inc. 410 South Phillips Avenue Sioux Falls, SD 57104-6824 Phone: (605) 334-1200 Fax: (605) 357-5423

Sharon:

Please send us your manual for intraLATA/interLATA equal access and dialing parity with Midco Communications.

Company Name:	
Contact Name:	
Address:	
City, State, Zip:	
Telephone Number:	
Fax Number:	
e-mail:	



EXHIBIT D

PIC CHANGE REQUEST FORM

Use this form to submit intraLATA/interLATA PIC change requests to Midco Communications Central Processing.

Carrier Name:_____ CIC Code:_____

Contact Name:_____ Contact Telephone:_____

Fax Number:_____ LOA ON FILE (Date) _____

BTN	WIN	LATA PIC	Intra LATA PIC	Charge PSP to Carrier	Effective Date	Date Input

ATTN: MIDCO CENTRAL PROCESSING (FAX): (605) 357-5423

Final Draft

Following is a finished draft of the Midcontinent Dialing Parity Plan with associated letters to customers and carriers.

BEFORE THE PUBLIC UTILITIES COMMISSISON OF THE STATE OF SOUTH DAKOTA

IN THE MATTER OF THE FCC ORDER ESTABLISHING NEW DEADLINES FOR IMPLEMENTATION OF INTRALATA DIALING PARITY BY LOCAL EXCHANGE CARRIERS TC99-030 MIDCO COMMUNICATIONS INTRALATA TOLL DIALING PLAN

Pursuant to the Order of the South Dakota Public Utilities Commission, Midco Communications hereby submits this intraLATA toll dialing plan for Commission review and approval, according to the guidelines ordered April 2, 1999:

 a description of how the LEC will offer dialing parity for each exchange and its proposed time schedule;

Currently, Midco Communications provides local exchange service only as a reseller of US West services under an approved agreement on file with the South Dakota Public Utilities Commission. Midco's ability to offer dialing parity depends in large part on the dialing parity plan developed by US West. Subject to coordination with the US West plan, Midco intends to support intraLATA dialing parity in the same manner it currently supports interLATA dialing parity in each US West exchange.

Midco Communications also intends to provide facilities based local service in selected US West exchanges. The details of providing that service is contained in an interconnection agreement between Midco Communications, Inc. and US West, Inc., pending approval of the South Dakota Public Utilities Commission (Docket TC99-023). Section 11 of the Agreement addresses dialing parity, offering the full two-PIC option in conformance with Section 271 of the Telecommunications Act. The Agreement also guarantees that for resale, or when Port/Switching Services are provided by US West, any end-user will be able to access the Midco network for services u ing the same dialing protocol that the end user would use to access the same service on the US West network.

2) a proposal for timely notification of its subscribers and the methods it proposes to use to enable subscribers to select an intraLATA toll provider, including the language the LEC proposes to use in its customer notification letter. The proposals shall include notification to current customers and new customers who join the network after the implementation of dialing parity;

Within thirty days following the approval of this plan, Midco Communications will notify current customers, including payphone service providers, of options to select an intraLATA toll provider through a "Customer Notification Letter". Customers who choose a carrier other than their current carrier will be advised to contact the carrier they've chosen to initiate the change. Customers choosing to stay with their current intraLATA carrier will not have to take any action. The "Customer Notification Letter" will include a list of intraLATA carriers in addition to the existing 1+ carrier that have indicated a desire to participate in the intraLATA toll presubscription process. The specific language of the "Customer Notification Letter" follows as Exhibit A. Additionally, within thirty days following the approval of this plan, Midco Communications will modify its Letter of Authorization (LOA) to confirm the customers choice of providers for: 1) Local exchange service, 2) IntraLATA toll, and 3) InterLATA toll service. The specific language of follows as Exhibit B.

Customers will be advised that they can change their intraLATA 1+ carrier during the first 60 days following the intraLATA toll dialing parity implementation. presubscription process without charge. After that date, \$5.00 per change will be charged.

 a LEC that is not a BOC must identify the LATA with which it will associate for the purposes of providing intraLATA and interLATA toll uialing parity;

In all cases, Midco Communications is associated with LATA 640, NPA 605.

4) a description of how carriers will be informed of the implementation process and schedule and how carriers may participate in the process; Midco Communications will notify all long distance carriers of record in the State of South Dakota of its implementation process and schedule through a letter. The specific language follows as Exhibit C.

 a description of how the LEC's business office will handle requests to change carriers.

Requests to change carriers will be handled by the central processing department, Carriers must send or fax a completed PIC Change Request Form. A sample follows as Exhibit D.

Dated this 21st day of April, 1999.

Respectfully submitted,

W. Tom Simmons Vice Fresident & General Manager Midoc itinent Communications 410 South Phillips Avenue Sioux Falls, SD 57104 Telephone (605) 334-1200

Exhibit A

Customer Notification Letter

Thank you for choosing Midco Communications as your provider for local exchange telephone services. Effective July 22, 1999, we are offering you the opportunity to select in-state 1+ long distance service from various long distance companies. Currently, your in-state long distance carrier is Midcontinent Communications. If you do nothing, your in-state long distance service will continue as usual with Midcontinent Communications. Your choice may include Midcontinent Communications, or any other long distance carrier of choice on the IntraLATA PIC list. Those carriers who have agreed to provide 1+ in-state long distance service are listed on the following "Carriers of Record" notification.

If you wish to make a change in carriers, you must contact the long distance company that you've chosen to order their service. They will contact us to complete the change.

Should you choose to make a change of in-state long distance carriers between now and September 22, 1999, there will be no charges for the change. After September 22, 1999, a \$5.00 charge per change will appear on your bill.

If you have questions, please do not hesitate to call our customer service department at 605-334-1200 or 1-800-888-1300.

Sincerely, Midcontinent Communications

W. Tom Simmons Vice President & General Manager Commercial Services

CARRIERS OF RECORD

Following is a list of carriers who have indicated an interest in offering intraLATA 1+ in-state long distance service. If you wish to change your intraLATA long distance carrier, please contact the carrier at the number listed to initiate the change.

AAA Telecommunications	1-800-555-4567
BBB Telecommunications	1-800-555-5678
CCC Telecommunications	1-800-555-6789
Midcontinent Communications	No Call Necessary
PPP Telecommunications	1-800-555-7891
SSS Telecommunications	1-800-555-1234

EXHIBIT B

Date:

Name (Company)

Address:

City, State, Zip:_____

Phone:

Midco Communications, Inc. 410 South Phillips Avenue Sioux Falls, SD 57104-6824

Dear Midco Communications:

This letter authorizes Midco Communications, Inc., to act as our local exchange carrier. I understand that we have a choice in selecting providers of intraLATA (in state long distance) and interLATA (out of state long distance) services. The choice may include Midco Communications, or any other long distance carrier of record in the state of South Dakota who have indicated a desire to be a carrier of choice on the IntraLATA/InterLATA PIC lists.

My IntraLATA (in state long distance) provider is: My InterLATA (out of state long distance) provider is:

By

By

Date:

We authorize Midco to make appropriate changes for all lines at the address listed above, and understand and agree to any charges that may be incurred for changing lines and PIC's to Midco or other choices indicated above.

Sincerely.

(Company-representative)

Date:

EXHIBIT C

Month 00, 1999

To: All Long Distance Carriers of Record In the State of South Dakota

Midcontinent Communications announces provisioning of IntraLATA equal access and dialing parity in the following South Dakota exchanges:

TBA

Midcontinent Communications will work closely with all carriers of record expressing an interest to be a carrier of choice. If you are interested in receiving a copy of our manual, which details ordering procedures, terms and conditions for the provision of Feature Group D, Switched Access Service, and provides the required forms and time tables, please complete and return or fax the enclosed request form to:

> Sharon Stettnichs Manager – Central Processing Midcontinent Communications 410 South Phillips Avenue Sioux Falls, SD 57104-6824 Fax: (605) 357-5423

If you have questions, you may contact Sharon Stettnichs at (605) 334-1200.

Sincerely, Midco Communications

W. Tom Simmons Vice President & General Manager



REQUEST FORM IntraLATA/interLATA Equal Access and Dialing Parity Manual

To: Sharon Stettnichs Manager – Central Processing Midcontinent Communications, Inc. 410 South Phillips Avenue Sioux Falls, SD 57104-6824 Phone: (605) 334-1200 Fax: (605) 357-5423

Sharon:

Please send us your manual for intraLATA equal access and dialing parity with Midco Communications.

Company Name:	
Contact Name:	
Address:	
City, State, Zip:	
Telephone Number:	
Fax Number:	
e-mail:	@



EXHIBIT D

PIC CHANGE REQUEST FORM

Use this form to submit intraLATA/interLATA PIC change requests to Midco Communications Central Processing.

Carrier Name: CIC Code:_____

Contact Name:_____ Contact Telephone:_____

Fax Number:_____ LOA ON FILE (Date) _____

Star North	loter LATA RIC	ntra LATA PIC	Charge PSP to Darrier	Effective Date	Date Input

ATTN: MIDCO CENTRAL PROCESSING (FAX): (605) 357-5423



Room 1575

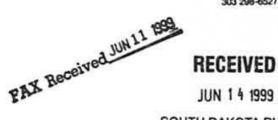
1875 Lawrence Street

Denver, CO 80202 303 298-6527

Michel L. Singer Attorney

6/11/1999

Via Overnight Delivery



Mr. Bill Bullard Executive Director SD Public Service Commission 500 East Capital Avenue Pierre, SD 57501

JUN 1 4 1999

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

Re: Implementation of Dialing Parity, Docket No. TC99-030

Dear Mr. Bullard:

Enclosed for filing on behalf of AT&T Communications of the Midwest Inc. is an original and 10 copies of AT&T's Request for Approval of Amended Dialing Parity Implementation Plan.

Please feel free to call me if there are any questions.

Sincerely

Enclosures

RECEIVED

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF SOUTH DAKOTA

JUN 1 4 1999

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE FCC ESTABLISHING NEW DEADLINES FOR IMPLEMENTATION OF INTRALATA DIALING PARITY BY LOCAL EXCHANGE CUSTOMERS

DOC LET NO. TC99-030



AT&T'S REQUEST FOR APPROVAL OF AMENDED DIALING PARITY IMPLEMENTATION PLAN

AT&T Communications of the Midwest, Inc. ("AT&T") hereby files this Amended Dialing Parity Implementation Plan, incorporated herein as Attachment A, in accordance with the South Dakota Public Utilities Commission Staff's Comments dated May 7, 1999.

WHEREFORE, AT&T requests that the Commission approve AT&T's Amended Dialing Parity Plan for the AT&T Digital Link Service.

Respectfully submitted this 11th day of June, 1999.

AT&T COMMUNICATIONS OF THEMIDWEST, INC.

Maria Arias-Chapleau

Michel Singer AT&T Law Department 1875 Lawrence Street, Suite 1500 Denver, Colorado 80202 Telephone: 303-298-6527 Facsimile: 303-298-6301

ATTACHMENT A

AT&T'S AMENDED DIGITAL LINK DIALING PARITY IMPLEMENTATION PLAN

I. Introduction

AT&T hereby files this Dialing Parity Implementation Plan in accordance with the Federal Communications Commission Order released on March 23, 1999, in Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, Petition of Southwestern Bell Telephone Company, Pacific Bell, and Nevada Bell for Expedited Declaratory Ruling on Interstate IntraLATA Toll Dialing Parity or, in the Alternative, Various Other Relief, CC Docket No. 96-98, NSD File No. 98-121. This Plan sets forth AT&T's proposal for providing intraLATA toll dialing parity within the state of South Dakota for customers subscribing to AT&T Digital Link Service.

II. Methodology

AT&T will provide full 2-PIC (intraLATA toll & interLATA) dialing parity, allowing AT&T Digital Link Service customers to pre-subscribe to one carrier for all interLATA calls and to the same or another carrier for all intraLATA toll calls. One interLATA IXC and one intraLATA IXC may be selected for each trunk subgroup. AT&T will convert all its central offices on a statewide basis. AT&T will provide the capability for pre-subscription, however subscribers must reprogram their PBX to send their traffic to their selected carrier in order for the presubscribed choice to be effective.

III. Availability

AT&T will provide full 2-PIC dialing parity in each LATA in which AT&T offers AT&T Digital Link Service. This service is being offered in South Dakota within U S WEST's territory and concurs with U S WEST's exchange areas and exchange maps filed by U S WEST with the South Dakota Public Utilities Commission.

IV. Subscriber Practices

AT&T will provide notice to its AT&T Digital Link Service subscribers of the forthcoming availability of intraLATA toll and interLATA dialing parity by means of a one-time mailing, a copy of which is attached as Exhibit 1. This mailing will be sent 30 days prior to the implementation of dialing parity, provided that at least one ASR has been received from an alternate carrier.

AT&T will inform new AT&T nodal services and AT&T Digital Link Service customers (i.e., customers that subscribe to local and lon, distance services on the same day) of the dialing parity feature available to them and, upon request, will provide customers a randomly ordered list of carriers available to them in their geographic area. New customers will also be informed that if the customer does not indicate a preference for an alternate carrier, interLATA and intraLATA toll traffic sent over AT&T Digital Link nodal facilities will be carried over AT&T's network as part of the subscribers' new nodal agreement.

AT&T will utilize competitively neutral business office practices when an existing AT&T Digital Link Service subscriber contacts AT&T to request information on dialing parity or to change to an alternate intraLATA toll and/or interLATA provider. Upon request, AT&T will provide customers a randomly ordered list of carriers available to them in their geographic area. Existing subscribers who do not affirmatively select an alternative provider will remain with their pre-existing intraLATA toll and interLATA carrier. Unless an existing AT&T Digital Link Service subscriber requests a change to his or her presubscribed interexchange carrier ("PIC") or to his or her presubscribed intraLATA toll carrier ("PTC"), any interLATA and intraLATA toll traffic sent over AT&T Digital Link nodal facilities will continue to be carried over AT&T's network.

AT&T will accept customer-initiated or carrier-initiated requests for alternate interLATA or intraLATA toll carrier on the date of implementation. If all necessary access facilities already exist, the PIC/PTC selection will be processed within three business days. Should the installation of new access facilities (e.g., from the AT&T switch to the LEC access tandem or from the customer premises to the AT&T switch) be required, the PIC/PTC selection will be completed within three business days of the new facilities being fully provisioned and operational. The new facilities will be provisioned within standard provisioning intervals.

At this time, AT&T will not impose charges on its customers for pre-subscribing to an alternate carrier or for changing their PIC/PTC selection.

V. Carrier Practices

AT&T will notify all Feature Group D carriers operating in South Dakota no later than 35 days prior to the implementation of dialing parity. A copy of the carrier notification letter is attached hereto as Exhibit 2.

Any interexchange carrier that wishes to be listed as a provider of intraLATA toll or interLATA service at the time of dialing parity implementation shall notify AT&T no later than 30 days prior to dialing parity availability. ASR requirements are available from the AT&T Carrier Service Center. AT&T will implement ASRs that require the installation of new access facilities in accordance with standard provisioning intervals.

VI. Service to Payphone Providers

The AT&T Digital Link Service is a dedicated T-1 based service, therefore, it is not a service currently available to payphone service providers.

VL Proposed Implementation Schedule

AT&T will implement dialing parity no later than 30 days after the date on which this plan is approved.

8

Exhibit 1

Date

Dear Customer,

As a valued AT&T Digital Link customer we are pleased to announce an enhancement to your AT&T Digital Link Service: the availability of intraLATA toll and interLATA (including international) pre-subscription. Pre-subscription gives you the opportunity to choose an alternate carrier to complete your intraLATA toll and/or interLATA calls.

AT&T currently completes your intraLATA toll and 1+ interLATA calls, and will continue to be your long distance company unless you choose otherwise.

Other companies will solicit your intraLATA toll and interLATA business. Before making a change, however, please remember that each company's rates, plans and policies are different. We encourage you to contact any long distance company that you are interested in to discuss their services in detail. For your convenience, attached is a list of long distance providers and their toll free numbers.

Since AT&T Digital Link Service is an extension of your existing AT&T Long Distance Service, changing long distance carriers could affect your volume discount structure. You should also consider contacting your AT&T account representative for further details on the effect switching long distance companies would have on your discount structure and your ability to meet your current long distance usage commitments, if any.

If you wish to change your intraLATA long distance carrier, you should directly contact the long distance company you have chosen to initiate that change with the local exhange carrier and ensure your account is properly established. This feature is available to you effective [date]. AT&T will not impose any charges for this feature.

As always, we are grateful for your continued business. If you have any questions or wish to make a change, please contact our business office at 1-877-325-5968 on or after [date].

Sincerely,

AT&T Local Services

Exhibit 2

Date:

To: All IntraLATA and InterLATA Carriers.

The purpose of this correspondence is to provide formal notification of AT&T's intention to offer IntraLATA and InterLATA Dialing Parity.

Effective [date] AT&T Digital Link Customers will be permitted to pre-subscribe to alternate and/or separate IntraLATA and InterLATA Carriers.

Carriers interested in participating in this offer should submit the appropriate Access Service Request (ASR) forms to the AT&T Carrier Service Center (CSC) by [date]. Carriers should provide AT&T will their toll free number by writing it on the bottom margin of the ASR form submitted to the AT&T CSC.

Requests for additional information or ASR submission may be directed to AT&T's CSC at the following address:

> AT&T CSC 900 Rtes 202/206 North Room 5C250 Bedminster, NJ 07921-0752 Tel r.o. 908 234-7480 Fax no. 908 719-7229

Sincerely,

USY	WEST, INC. LAW DEPARTM	ENT	
05	1801 CALIFORNIA STREET		
	SUTTE 5100		
	DENVER, COLORADO 80202		
To: R	olayne Ailts Wiest		
		-	
Telephone Number:			
and the second se	605-773-3809	-	
From:	Todd Lundy	- 7	
Telephone Number:	(303)-672-2783	-	
Facsimile Number:	(303) 298-8197	-	
Date: 06/14/99	12:40:42 PM		
Number of pages include	ing cover sheet:4		
remote of beges mental			
Special instructions/com	menta:		
Special instructions con			
	IN THIS COVER SHEET OR ACCOMPANYING DOCU	MENT IS ATTORN	EY-CLIENT
FORMATION CONTAINED	IN THIS COVER SHEET OR ACCOMPANYING DOCU AND CONTAINS CONFIDENTIAL INFORMATION IN THE UNITAINS CONFIDENTIAL INFORMATION IN	TENDED ONLY F	OR THE
FORMATION CONTAINED RK PRODUCT PRIVILEGEI SSEE OR HIS/HER DESIGN NY DISCLOSURE, DISTRI	O AND CONTAINS CONFIDENTIAL INFORMATION IN THE IF YOU ARE NOT THE ADDRESSEE OR HIS/HER BUTION, OR COPYING OF THIS COMMUNICATION O	TENDED ONLY F	OR THE
FORMATION CONTAINED RK PRODUCT PRIVILEGES SSEE OR HIS/HER DESIGN NY DISCLOSURE, DISTRI ICE ON ITS CONTENTS IS	D AND CONTAINS CONFIDENTIAL INFORMATION IN THE IF YOU ARE NOT THE ADDRESSEE OR HIS/HER BUTION, OR COPYING OF THIS COMMUNICATION O PROHIBITED.	TENDED ONLY F DESIGNEE, YOU R TAKING ACTIO	or the Are advis In In
FORMATION CONTAINED RK PRODUCT PRIVILEGE SSEE OR HIS/HER DESIGN NY DISCLOSURE, DISTRI NCE ON ITS CONTENTS IS RECEIVED THIS COMMUN	D AND CONTAINS CONFIDENTIAL INFORMATION IN THE IF YOU ARE NOT THE ADDRESSEE OR HIS/HER BUTION, OR COPYING OF THIS COMMUNICATION O PROHIBITED. VICATION IN ERROR, PLEASE IMMEDIATELY NOTIF	TENDED ONLY F DESIGNEE, YOU R TAKING ACTIO	OR THE ARE ADVISION IN
FORMATION CONTAINED RK PRODUCT PRIVILEGE SSEE OR HIS/HER DESIGN NY DISCLOSURE, DISTRI NCE ON ITS CONTENTS IS RECEIVED THIS COMMUN	D AND CONTAINS CONFIDENTIAL INFORMATION IN THE IF YOU ARE NOT THE ADDRESSEE OR HIS/HER BUTION, OR COPYING OF THIS COMMUNICATION O PROHIBITED.	TENDED ONLY F DESIGNEE, YOU R TAKING ACTIO	OR THE ARE ADVISION IN
FORMATION CONTAINED RK PRODUCT PRIVILEGE SSEE OR HIS/HER DESIGN NY DISCLOSURE, DISTRI NCE ON ITS CONTENTS IS RECEIVED THIS COMMUN	D AND CONTAINS CONFIDENTIAL INFORMATION IN THE IF YOU ARE NOT THE ADDRESSEE OR HIS/HER BUTION, OR COPYING OF THIS COMMUNICATION O PROHIBITED. VICATION IN ERROR, PLEASE IMMEDIATELY NOTIF	TENDED ONLY F DESIGNEE, YOU R TAKING ACTIO	OR THE ARE ADVISION IN

JUN. 14. 1999 11: 439M US WEST LEGAL

NO.895 P.2/4

I ASIMPER

U S WEST, Inc. 1901 Colfeenia Stroet, Bulles 5100 Demer, Cottradie 65202 303 672-2763 Familetia 303 250-4197

Todd L Landy Beter Alway

June 14, 1999

VIA FAX: 605-773-3809

Rolsyne Ailts Wiest General Counsel South Dakota Public Utilities Commission Capitol Building, First Floor 500 East Capitol Avenue Pierre, SD 57501-5070

Re: U S WEST's Responses Concerning Dialing Parity Inquiries

Dear Rolayne,

This letter responds to the Commissioners' inquiries on U S WEST's dialing parity plan as stated during the Commission's meeting of June 8, 1999.

 What authority does the South Dakota Commission have to waive the FCC rules regarding implementation of dialing parity by July 22, 1999?

On March 23, 1999 the Federal Communications Commission issued an order establishing new deadlines for the implementation of intraLATA dialing parity by exchange carriers in CC Docket No. 96-98, FCC 99-54. That order required the filing of a specific implementation plan no later than April 22, 1999. Implementation would then occur 30 days after approval of that plan by the individual state commission. The FCC has authority over the mandated implementation date and any waiver of such date would need approval from the FCC. U S WEST has filed the necessary waiver with the FCC and to date has received no response.

U S WEST's Reply Comments on the waiver issue were responding to the comments of the Commission Staff. Simply stated, U S WEST believes that only the FCC can provide U S WEST with a waiver of the FCC's rules.

What information have states allowed U S WEST to disseminate about its intraLATA products when customers call U S WEST for new service? States have allowed U S WEST to say that it is a provider of intraLATA toll services. States have imposed some limitations on U S WEST's ability to market its intraLATA services when customers call for new service. However, U S WEST is allowed to respond to and answer customers' inquiries about its intraLATA products without transferring the call to another U S WEST representative.

3. Is 555-1212 directory assistance subject to presubscription?

Calls placed via a dialing pattern of 555-1212 have been excluded from presubscription. Directory assistance calls placed via a dialing pattern of NPA 555-1212 are considered local calls billed at a flat rate and have not been subject to presubscription in Arizona, Minnesota, New Mexico, Utah, Montana, Washington, Oregon and Nebraska.

 Prior to July 22, 1999, will U S WEST accept requests for carrier changes from end users or carriers?

U S WEST will be ready to accept carrier-initiated requests to change an end user's intraLATA carrier of choice on the first day of implementation, currently scheduled for July 22, 1999. Systems do not allow for the presubmission of changes from either carriers or end users prior to that date.

What will be U S WEST's response to a customer-initiated call before July 22, 1999 requesting a carrier change?

Customers who contact U S WEST before July 22, 1999 to facilitate their change of intraLATA provider from U S WEST to an alternative provider will be referred to their carrier of choice.

Does U S WEST maintain a database of 800 telephone numbers for interexchange carriers providing intraLATA service?

U S WEST does not maintain a database of competing carriers' 800 numbers to be provided for customer referral purposes. If the end user is unsure of the carrier's 800 number they will be referred to 800-directory assistance or the yellow pages.

7. What has been the U S WEST's experience in other states in terms of accepting requests for carrier changes on the day of dialing parity implementation, and has U S WEST been able to process those requests on the day of implementation?

In the majority of U S WEST states, no preselection period was required. A preselection process involves manual functions and is a time-consuming and costly process.

Customers may contact their preferred carrier any time after receiving the customer notification mailing from U S WEST. Coincident with this mailing U S WEST will notify all interexchange carriers of the processing requirements for submission of an intraLATA carrier change. Carriers can then submit them to U S WEST on or after the implementation date of July 22, 1999.

NO.895

P.4/4

U S WEST implemented Toll Dialing Parity in Nebraska on February 1, 1999, in Montana on February 4, 1999, and in Colorado, Oregon and Washington on February 8, 1999. U S WEST began processing carrier changes on the first day of implementation in those states, and all five states were current on day one. US WEST believes the same will be true in South Dakota.

8. When did the other states rule on including an intraLATA PIC freeze as part of a customer's request for a long distance PIC freeze?

The states that authorized U S WEST to include an intraLATA freeze as part of a customer's request for a long distance freeze were entering dialing parity orders for implementation in February, 1999, which was before the April 27, 1999, effective date of the FCC rules.

On May 18, 1999, after the April 27, 1999 effective date of the FCC rules, the Nebraska Commission dismissed AT&T's complaint against U S WEST regarding the inclusion of intraLATA PIC freezes as part of customer-requested long distance PIC freezes. U S WEST believes that the Nebraska Commission's dismissal of AT&T's complaint is consistent with the expectations of customers, that their requests for long distance PIC freezes to prevent slamming by interexchange carriers would include freezes of their intraLATA PIC.

We hope this information is helpful. Thank you.

Sincerely,

Tel Loby

Todd L. Lundy

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF SOUTH DAKOTA

IN THE MATTER OF THE FCC ORDER) ORDER SETTING ESTABLISHING NEW DEADLINES FOR) REQUIREMENTS FOR IMPLEMENTATION OF INTRALATA DIALING) PLANS PARITY BY LOCAL EXCHANGE CARRIERS) TC99-030

On March 23, 1999, the Federal Communications Commission (FCC) issued an order establishing new deadlines for implementation of intraLATA dialing parity by local exchange carriers (LECs). In the Matters of Implementation of the Local Competition Provisions of the Telecommunications Act of 1996; Petition of Southwestern Bell Telephone Company, Pacific Bell, and Nevada Bell for Expedited Declaratory Ruling on Interstate IntraLATA Toll Dialing Parity or, in the Alternative, Various Other Relief, CC Docket No. 96-98, FCC 99-54 (released March 23, 1999). The order states that "[n]o later than April 22, 1999, all LECs must file intraLATA toll dialing parity plans with the state regulatory commission for each state in which the LEC provides telephone exchange service if a plan has not yet been filed with such state commission. Once a state commission has approved a plan, the LEC must implement its plan no later than 30 days after the date on which the plan is approved." Id. at ¶ 7. If the state commission has not acted on the plan by June 22, 1999, the LEC must file the plan with the Common Carrier Bureau of the FCC. Id.

At its March 30, 1999, meeting, the Public Utilities Commission (Commission) opened a docket in order to review intraLATA toll dialing plans and established a procedural schedule that would allow other parties to file written comment on the LECs' intraLATA toll dialing plans. No parties objected to this proposal. At its April 1, 1999, meeting, the Commission issued guidelines for LECs to follow when developing their intraLATA toll dialing plans. On the issue of cost recovery, the Commission decided that if a LEC believes that it needs cost recovery, the LEC should file for cost recovery in a separate proceeding before the Commission in accordance with FCC rules. At its May 12, 1999, meeting and its June 8, 1999, meeting, the Commission approved carrier notification letters. At its June 8, 1999, meeting, the Commission also requested additional information from the parties.

At its June 15, 1999, meeting, the Commission considered whether to order any changes to the filed plans. The Commission has jurisdiction over this matter pursuant to SDCL 49-31-81 and the Federal Telecommunications Act of 1996, specifically 47 U.S.C. §§ 251 and 252. The Commission voted to require the following changes be made to the plans:

(1) If a customer currently has an interLATA PIC freeze, the LEC may not automatically extend that freeze to the intraLATA PIC. According to FCC rules, separate authorizations must be received for each service for which a carrier freeze is requested. 47 C.F.R. § 64.1190(c). Thus, a customer's intraLATA PIC may be frozen only if the customer separately authorized the freeze in accordance with § 64.1190;

(2) Customers shall be allowed at least one intraLATA carrier PIC choice free of charge during the first 60 days following implementation;

(3) If an existing or new customer contacts the LEC to pick or change its intraLATA carrier, the LEC may not market its products or services on that same call but may answer customer initiated questions;

(4) Directory assistance calls are not required to be subject to presubscription;

(5) The Commission will allow a thirty day window for solicitation of customers prior to implementation and a LEC may wait until the date of implementation to accept intraLATA PICs;

(6) If a new customer does not indicate a preference for a carrier, the LEC must comply with 47 C.F.R. § 51.209(c) which prohibits the automatic assignment of a customer's intraLATA toll traffic;

(7) A LEC shall send notice of the availability of dialing parity regardless of whether it has received any Access Service Requests;

(8) In addition to its customer notification letter, each LEC shall provide a list of companies the customer can choose from and the companies' toll free numbers;

(9) In the customer notification letter, if the customer wants to change its existing carrier, the customer shall be told to contact the carrier it wants to change to instead of the LEC;

(10) The first sentence and fourth paragraph of AT&T's customer notification letter are not competitively neutral and shall be revised or deleted;

(11) Each plan shall address the issue of payphones.

Each LEC that filed a plan that does not meet these requirements shall re-file a new plan consistent with these requirements by Friday, June 18, 1999.

With respect to U S WEST's request to reclassify its toll services as fully competitive, the Commission finds that in order to reclassify a service, the procedures as outlined in SDCL 49-31-3.2 must be followed. Thus, U S NEST's request to reclassify its toll services from emerging competitive to fully competitive is denied. The Commission further orders the LECs that have failed to notify the Commission of whether they currently provide intraLATA dialing parity to submit written notification prior to June 22, 1999.

It is therefore

ORDERED, that each LEC that filed a plan that does not meet the above-listed requirements shall re-file a new plan consistent with these requirements by Friday, June 18, 1999; and it is

FURTHER ORDERED, that U S WEST's request to reclassify its toll services from emerging competitive to fully competitive is denied; and it is

FURTHER ORDERED, that LECs that have failed to notify the Commission of whether they currently provide intraLATA dialing parity shall submit written notification prior to June 22, 1999.

Dated at Pierre, South Dakota, this 15th day of June, 1999.

CERTIFICATE OF SERVICE The undersigned hereby certifies that this document has been served today upon all parties of record in this dockel, as listed on the docket service list, by facsimile or by first class mail, in properly addres with charges prepaid thereon. (OFFICIAL SEAL)

BY ORDER OF THE COMMISSION:

JAMES A. BURG, Chairman

PAM NELSON . Commissioner

LASKA SCHOENFELDER, Commissioner



Michel L. Singer Attorney

June 14, 1999

Vie Overnight Delivery

Mr. Bill Bullard Executive Director SD Public Service Commission 500 East Capital Avenue Pierre, SD 57501 Room 1575 1875 Lawrence Street Derwer, CO 80202 303 298-6527

RECEIVED

JUN 1 5 1999

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

Re: Implementation of Dialing Parity, Docket No. TC99-030

Dear Mr. Bullard:

Enclosed for filing on behalf of AT&T Communications of the Midwest Inc. is an original and 10 copies of AT&T's Responses to the Commission's Questions during the June 8, 1999 Meeting.

Please feel free to call me if there are any questions.

Sincerely,

Michel Singer

Michel L. Singer 97

Enclosures

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF SOUTH DAKOTA

IN THE MATTER OF THE FCC ORDER ESTABLISHING NEW DEADLINES FOR IMPLEMENTATION OF INTRALATA DIALING PARITY BY LOCAL EXCHANGE CARRIERS

) DOCKET NO. TC99-030

AT&T'S RESPONSES TO COMMISSION QUESTIONS DURING THE JUNE 8, 1999 MEETING

AT&T Communications of the Midwest, Inc. ("AT&T") submits the following responses to the questions asked by the Commission during the June 8, 1999 meeting.

Question 1. Regarding business practices to new customers, what have other states decided regarding U S WEST's ability to market its services on the call?

Response: Although Colorado and Nebraska did not address the issue, most states have required U S WEST to remain competitively neutral during its contacts with new customers. The Arizona, Minnesota, and Montana Commissions required U S WEST to submit scripts and ruled that U S WEST could not use new customer contacts to market its intraLATA toll products and services. The Iowa Utilities Board did not require the submission of scripts, but similarly ruled that U S WEST could not use a new customer's call to set up local service as an opportunity to market its intraLATA toll products and services. The New Mexico Commission required U S WEST to revise its script to omit the language---"and U S WEST is one of those companies"--when reading from a randomly rotated list of participating carriers. The Wyoming Commission ruled that new customer contacts must be handled in a competitively neutral manner, and the Oregon and Washington Commissions ruled that U S WEST could only market its toll services and products to new customers if the customer inquired about them.

Question 2. What have other states decided on the issue of PIC freezes following the recent FCC decision?

<u>Response</u>: Of the three other states that have considered the issue since the FCC Order, Iowa and North Dakota have denied U S WEST's proposal to extend interLATA PIC freezes to the intraLATA account. The Idaho Commission has received briefs on the subject from U S WEST and AT&T, but has not yet issued a ruling.

In its Order Granting AT&T's and Sprint's Petition for Declaratory Ruling, issued May 28, 1999, the Iowa Utilities Board ruled that "U S West's dialing parity plan, insofar as it provides for an automatic extension of pre-existing interLATA PIC freezes to intraLATA service after the initial 120 days of dialing parity, is inconsistent with 47 C.F.R. § 64.1190," which requires separate authorization for each PIC freeze implemented as (f the effective date of the rule.

The North Dakota Public Service Commission, in its May 28, 1999, Order on Customer Notification Proposal, stated, "The FCC rules do emphasize that customers are to authorize PIC freezes for specific services, not accounts. Given this policy, we believe the most appropriate Commission action is to not allow automatic extension of interLATA PIC freezes to the intraLATA toll business."

2

Question 3. Should 0- calls be subject to presubscription? What have other states decided on the issue of 0- calls?

Response: AT&T does not believe that 0 calls should be subject to presubscription and states have agreed with this position. To allow customers more choices, however, AT&T recommends that the operator instruction must include a script that informs customers of their option to hang up and dial the number directly, which would enable the customer to use their pre-selected carrier. Clearly there are some 0calls that require operator assistance. Scripts associated with these calls would need to include direction that customers could dial 00 to reach their presubscribed carrier's operator. To handle 0- dialed calls otherwise would not provide customers with the information necessary to make a decision on which carrier they want to handle their calls.

<u>Question 4</u>. Why does AT&T have a concern regarding U S WEST's business practices to existing customers?

<u>Response</u>: Even though customers are instructed in the notification letter to contact the toll carrier of their choice, the reality is that many existing U S WEST customers will contact U S WEST. In fact, U S WEST's plan states that it will take orders from customers who call about changing their intraLATA carrier. (U S WEST plan, Business Practices Existing Customers, p. 2). Protections need to be in place to protect against inappropriate conduct by U S WEST representatives under those circumstances.

Although U S WEST states that it will handle these requests in a competitively neutral manner, without review of scripts, there is no assurance that this contact will, in fact, be competitively neutral. Furthermore, U S WEST states that should the customer request information about its toll products and services, U S WEST will respond to the customer's request. Since U S WEST has the unique advantage of being the primary contact for customers in a variety of situations, permitting U S WEST to use these calls to market its intraLATA toll products and services would provide U S WEST with an anticompetitive advantage. If a customer requests information on U S WEST's intraLATA toll products and services, the U S WEST customer representative should transfer the call to a U S WEST sales agent.

Question 5. When U S WEST commented on AT&T's plan, it apparently stated that the FCC forbids the practice of automatically assigning customers to AT&T as stated in AT&T's plan. What is AT&T's response to this assertion?

Response: Although AT&T did not receive U S WEST's comments on its plan, AT&T's plan states that existing subscribers who do not affirmatively select an alternative provider will remain with their pre-existing intraLATA toll and interLATA carrier. AT&T believes this policy is consistent with the FCC's intent. U S WEST, likewise, retains existing customers who do not affirmatively select another intraLATA carrier.

4

If new AT&T Digital Link customers do not affirmatively select an intraLATA carrier, their calls will be routed over AT&T's network. With the implementation of intraLATA dialing parity, AT&T Digital Link customers may select any participating carrier for their intraLATA calls, the issue is simply that they must select a carrier. AT&T is currently upgrading its switch to permit a "No PIC" situation where a customer that does not select a carrier would have to dial around (i.e., 1010XXX) to complete their call. AT&T's upgrade is expected to be completed in early 2000. At this time, AT&T Digital Link customers who attempt to dial around receive a recording that states that their call cannot be completed as dialed. In reality, AT&T Digital Link customers are large businesses that use a PBX, and will select an intraLATA carrier for their calls. In fact, these customers frequently use a number of carriers on their trunks for network back-up purposes. Additionally, AT&T Digital Link customers are required to have at least one line from their local exchange company, which would permit dial around capability. Submitted the 14th day of June 1999.

AT&T COMMUNICATIONS OF THE MIDWEST, INC.

Maria Arias-Chapleau 98

Maria Arias-Chapleau Michel Singer 1875 Lawrence Street, Suite 1575 Denver, CO 80202 (303) 298-6527 (303) 298-6301 (Facsimile)

ATTORNEYS FOR AT&T COMMUNICATIONS OF THE MIDWEST, INC.

RECEIVED

JUN 17 1999

IMPLEMENTATION PLAN FOR INTRALATA TOLL DIALING PARITY

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

Accent Communications, Inc. submits this Implementation Plan for IntraLATA Toll Dialing Parity (hereinafter referenced as "the Plan") pursuant to 47 C.F.R. § 51.213 and recent Orders of the South Dakota Public Utilities Commission (hereinafter referenced as the "Commission") which require this filing on or before April 22, 1999. The purpose of the Plan is to provide information to the Commission concerning how and when Accent Communications, Inc. will convert to intraLATA toll dialing parity, or, as it is sometimes called, intraLATA equal access. The provisioning of such capability will permit customer to select which long distance carrier they want to handle their intraLATA 1+ calls.

1. Company name and address:

Accent Communications, Inc. 235 E 1st Av PO Box 260 Groton, SD 57445-0260 FAX # 605 397-2350

2. Associated LATA:

Accent Communications, Inc. is located in and for purposes of this Plan associates with LATA 640.

3. Description of offering.

Accent Communications, Inc. will offer intraLATA toll dialing parity through the "full 2-PIC" presubscription software installed on a centralized basis at the access tandem switch of South Dakota Network, Inc. ("SDN"). The "full 2-PIC" method of presubscription allows a customer to presubscribe to one long distance carrier for all 1+ intraLATA toll calls and to presubscribe to the same or another long distance carrier for all 1+ intraLATA toll calls. Directory assistance calls reached by dialing 1+ the telephone number are included in this intraLATA presubscription process. Because the intraLATA toll dialing parity capability will be provisioned via SDN at 2900 West 10th, Sioux Falls, SD 57104, interconnection and access necessary for participation in the offering may be ordered by long distance carriers via SDN.

Included local exchange areas and conversion date.

IntraLATA toll dialing parity through SDN will be made available in the following local exchange areas beginning July 22, 1999:

 Bristol, SD
 605-492

 Doland, SD
 605-635

 Frederick, SD
 605-329

 Hecla, SD
 605-994

 Northville, SD
 605-887

 N Hecla, SD
 701-992

1

5. Interexchange carrier "carrier" notification.

All carriers certified in South Dakota to provide long distance services will be notified by June 1, 1999, of the conversion to intraLATA toll dialing parity (a sample copy of the carrier notification letter to be used is attached hereto as Appendix A). These carriers will be asked to respond by June 16, 1999, if they want to participate in the intraLATA toll presubscription process (a sample copy of the form which carriers will complete to indicate their participation in the presubscription process is attached hereto as Appendix B). Carriers that choose to participate in the presubscription process, shall submit verified preferred carrier change orders to Accent Communications, Inc. to effectuate requests by subscribers for their intraLATA toll service.

Accent Communications, Inc. will make available preconversion customer name and address lists. These customer lists are available to assist participating carriers in their presubscription solicitation efforts. These lists may be provided subject to a reasonable, non-discriminatory fee, with delivery contingent upon the carrier meeting all requirements for participation in the intraLATA presubscription process.

6. Customer notification.

A. Current customers.

Customers, including payphone service providers, will be notified of the conversion to intraLATA toll dialing parity by letter postmarked no later than June 25, 1999. In such letter, customers will be advised of their intraLATA choices. Customers will be given the option to remain with their existing intraLATA 1+ carrier, James Valley Long Distance, or to choose a different intraLATA carrier for their 1+ service. The letter will include a list indicating all carriers in addition to the existing 1+ carrier that have chosen to participate in the intraLATA toll presubscription process (a sample copy of the customer notification letter that will be used is attached hereto as Appendix C). The list of carriers will include a toll free telephone number for each carrier listed.

Customers will be advised that if they choose a carrier other than their existing intraLATA 1+ carrier, they must directly contact the long distance company that the r've chosen in order to initiate that change. Those customers choosing to stay with their existing intraLATA 1+ carrier, will not have to take any action. Their intraLATA 1+ service will remain with their current provider. Based on letters of agency received directly from participating carriers, Accent Communications, Inc., as of the date and time that intraLATA dialing parity is implemented, will execute all necessary carrier selection changes.

Customers will not be charged for making any change to their intraLATA 1+ carrier during the presubscription process. In addition, customers will be advised that they will be given 60 days after the intraLATA toil dialing parity implementation date to change their intraLATA 1+ carrier at no charge.

Any preferred carrier freeze obtained by customers previously on their interLATA 1+ service, shall not be extended to prevent their participation in the intraLATA toll presubscription process. Any preferred carrier freeze on a customer's intraLATA 1+ service shall be specifically authorized by the customer.

In the event that no access ser ce requests are received and no carriers other than James Valley Long Distance choose to participate in the intraLATA 1+ offering, Accent Communications, Inc. shall still provide notice to its subscribers that 1+ dialing parity for intraLATA toll calls is available.

B. New customers.

New customers to Accent Communications, Inc.'s local exchange service, commencing such service after June 25, 1999, will be asked to choose both an intraLATA and interLATA carrier. They will be informed that regulations require that they choose a carrier for their intraLATA 1+ service (for calls within this LATA) and also choose a carrier for their interLATA 1+ service (for calls going outside this LATA). Accent Communications, Inc. will either inform or provide new customers a list of all carriers participating in intraLATA 1+ services and all carriers participating in interLATA 1+ services. Customer service representatives of Accent Communications, Inc. will reference the names of all carriers in the customer's exchange area providing 1+ toll service. If the customer requests, the customer service representative will provide contact telephone numbers for the available carriers. Lists used by the customer service representatives will contain carriers' names in random order.

Customers applying for service will be encouraged to make a carrier selection. New customers will make an affirmative selection before they will be assigned to any carrier for either their intraLATA 1+ or interLATA 1+ service. New customers will be advised that neither intraLATA 1+ dialed calls or interLATA 1+ dialed calls originated from the customer's local line will be possible until a carrier selection is made. Until a selection is made, non-selecting customers will need to dial a carrier access code to make either intraLATA or interLATA toll calls.

Accent Communications, Inc. upon being contacted by either new or existing customers and receiving requests for a preferred carrier or preferred carrier change shall not market its own intraLATA 1+ service on the same call, but may answer customer initiated questions.

7. Request for approval of Plan.

Accent Communications, Inc. asks that the Commission grant its official approval of this Plan no earlier than June 22, 1999.

Dated this 16th day of June, 1999.

Respectfully submitted, Clinton Hanson, Manager Accent Communications, Inc.

ACCENT COMMUNICATIONS, INC. IntraLATA Dialing Parity Timeline

Carrier notifications completed by: June 1, 1999

Carrier responses due by: June 16, 1999

Customer notification completed by: June 25, 1999

Due date for customer response forms: July 12, 1999

IntraLATA dialing parity implementation date: July 22, 1999

End of 60 day grace period: September 20, 1999

APPENDIX A

Date

TO: All Long Distance Carriers of Record in the State of South Dakota

i ITN: Route to person responsible for regulatory matters.

Accent Communications, Inc. (ACI) is pleased to announce the provisioning of IntraLATA equal access in certain local exchange areas. A list of these exchanges is attached. This service will be made available to customers on July 22, 1999.

It is ACI's intent to work closely with all users of access and maintain an impartial position with regard to the end user's selection of an IntraLATA long distance carrier. ACI will supply a PIC list for the end user's selection of an IntraLATA long distance carrier. However, because IntraLATA equal access will be provisioned via South Dakota Network (SDN) at 2900 West 10th Street, Sioux Falls, SD 57104, interconnection and access may be ordered via SDN.

Please complete and return the attached form if you wish to be a carrier of choice on the IntraLATA equal access PIC list for the exchanges listed on the next page.

Questions may be directed to Nancy Larsen at 397-2323.

You must return your request for participation postmarked no later than June 16, 1999, to:

Nancy Larsen Accent Communications, Inc. 235 E 1st Av PO Box 260 Groton, SD 57445 Fax # 605-397-2350

Sincerely,

Clinton Hanson, Manager Accent Communications, Inc.

cc: Bill Bullard, South Dakota Public Utilities Commission

Accent Communications, Inc. exchanges to provide IntraLATA equal access:

TOWN	NPA	NXX
Bristol	605	492
Doland	605	635
Frederick	605	329
Hecia	605	994
Northville	605	887
North Hecla	701	992

APPENDIX B

INTRALATA PIC LIST PARTICIPATION FORM FOR ACCENT COMMUNICATIONS, INC.

C

CARRIER NAME	
ACNA	
CIC	
BILLING ADDRESS	
BILLING CONTACT	
PHONE NUMBER	
FAX NUMBER	
E-MAIL ADDRESS	
CUSTOMER SERVICE NUMBER (BUSINESS)	
CUSTOMER SERVICE NUMBER (RESIDENCE)	
WOULD LIKE TO BE INCLUDED ON THE INTRALATA PIC LIST?	YES NO
SIGNATURE	
TITLE	
DATE	

Please respond by June 16, 1999.

Address: Nancy Larsen Accent Communications, Inc. PO Box 260 Groton, SD 57445-0260

APPENDIX C

Date:

To: All Customers of Accent Communications, Inc.

Accent Communications, Inc. is pleased to announce that effective July 22, 1999, it will be making changes to its telephone switching equipment which will allow for intraLATA long distance dialing parity in your local exchange area. With these changes, you will have the ability to select the long distance company for your intraLATA (generally in-state) 1+ long distance service.

In conjunction with making these changes, Accent Communications, Inc. is asking all of its local exchange subscribers to choose whether they wish to retain the current long distance company providing their intraLATA 1+ long distance service or wish to select another company for such service.

Currently James Valley Long Distance provides your in-state long distance service. This company will continue to provide service to you unless you select another carrier. If you do nothing, your 1+ intraLATA long distance service will remain with James Valley Long Distance.

Attached is a list of long distance companies, other than James Valley Long Distance, that have agreed to provide 1+ intraLATA long distance services in your area. If you wish to change your 1+ in-state (intraLATA) long distance carrier, you must directly contact the long distance company that you've chosen in order to initiate that change.

You will not be charged for making a change to your existing 1+ intraLATA long distance service in response to this notice. In addition, for a period of 60 days after July 22, 1999, you may decide to change your 1+ intraLATA long distance carrier, one time, at no charge. After September 20, 1999, you will incur a Primary Interexchange Carrier (PIC) charge of \$5.00 for changing carriers.

Please call our office at 605-397-2323 if you have any questions on this matter.

Sincerely,

Accent Communications, Inc.

LIST

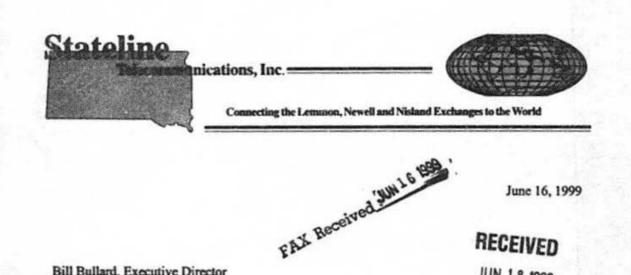
Listed below are the other Long Distance companies that are willing to offer you IntraLATA 1+ (generally in-state) long distance services. If you wish to change your intraLATA 1+ long distance carrier, please directly contact the long distance company that you've chosen in order to initiate that change.

ABC Telephone Company, Inc. Bus/Res: 1-800-555-1234

LMNOP Telecommunications Bus: 1-800-555-2345

ZXC Telephone Company Bus/Res: 1-800-555-3456

Please respond on or before July 12, 1999.



Bill Bullard, Executive Director South Dakota Public Utilities Commission State Capitol Building 500 East Capitol Avenue Pierre, South Dakota 57501

JUN 1 8 1999

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

RE: Docket TC99-030 (Implementation Plan for IntraLATA Dialing Parity)

Dear Bill:

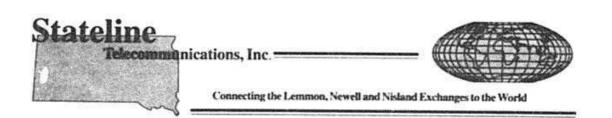
Enclosed for filing in the above referenced Docket is the "Revised Implementation Plan for IntraLATA Toll Dialing Parity" of Stateline Telecommunications, Inc. Please note that carrier notification letters were sent in late May as approved by the Commission. We therefore request approval of this filed plan.

If Commission Staff or the Commissioners desire any additional information to supplement this filing, please advise. Thank you for your assistance in filing and distributing these documents.

Sincerely,

ministrative Assistant

JR:ss



IMPLEMENTATION PLAN FOR INTRALATA TOLL DIALING PARITY

Stateline Telecommunications, Inc. submits this Implementation Plan for IntraLATA Toll Dialing Parity (hereinafter referenced as "the Plan") pursuant to 47 C.F.R. § 51.213 and recent Orders of the South Dakota Public Utilities Commission (hereinafter referenced as the "Commission") which require this filing on or before April 22, 1999. The purpose of the Plan is to provide information to the Commission concerning how and when Stateline Telecommunications, Inc. will convert to IntraLATA toll dialing parity, or, as it is sometimes called, IntraLATA equal access. The provisioning of such capability will permit customers to select which long distance carrier they want to handle their IntraLATA 1+ calls.

1. Company name and address:

Stateline Telecommunications, Inc. P.O. Box 39 Bison, SD 57620

Telephone (605) 244-5236 Fax (605) 244-7288

2. Associated LATA:

Stateline Telecommunications, Inc. 15 located in and for purposes of this Plan associates with LATA 640.

3. Description of offering.

Stateline Telecommunications, Inc. will offer IntraLATA toll dialing parity through the "full 2-PIC" presubscription software installed on a centralized basis at the access tandem switch of South Dakota Network, Inc. ("SDN"). The "full 2-PIC" method of presubscription allows a customer to presubscribe to one long distance carrier for all 1+ IntraLATA toll calls and to presubscribe to the same or another long distance carrier for all 1+ IntraLATA toll calls. Directory assistance calls reached by dialing 1+ the telephone number are included in this IntraLATA presubscription process. Because the IntraLATA toll dialing parity capability will be provisioned via SDN at 2900 West 10th, Sioux Falls, SD 57104, interconnection and access necessary for participation in the offering may be ordered by long distance carriers via SDN.

P. O. Box 39, Bison, SD 57620, Phone: 605-244-5236, Fax: 605-244-7288

4. Included local exchange areas and conversion date.

IntraLATA toll dialing parity through SDN will be made available in the following local exchange areas beginning July 22, 1999:

Nisland 605-257 Newell 605-456 Lemmon 605-374 Lemmon 701-376

5. Interexchange carrier "carrier" notification.

All carriers certified in South Dakota to provide long distance services will be notified by June 1, 1999, of the conversion to IntraLATA toll dialing parity (a sample copy of the carrier notification letter to be used is attached hereto as Appendix A). These carriers will be asked to respond by June 16, 1999, if they want to participate in the IntraLATA toll presubscription process (a sample copy of the form which carriers will complete to indicate their participation in the presubscription process is attached hereto as Appendix B). Carriers that choose to participate in the presubscription process shall submit verified preferred carrier change orders to Stateline Telecommunications, Inc. to effectuate requests by subscriber for their IntraLATA toll service.

Stateline Telecommunications, Inc. will make available preconversion customer name and address lists. These customer lists are available to assist participating carriers in their presubscription solicitation efforts. These lists may be provided subject to a reasonable non-discriminatory fee, with delivery contingent upon the carrier meeting all requirements for participation in the IntraLATA presubscription process.

6. Customer notification.

A. Current customers.

Customers, including payphone service providers, will be notified of the conversion to IntraLATA toll dialing parity by letter postmarked no later than June 25, 1999. In such letter, customers will be advised of their IntraLATA choices. Customers will be given the option to remain with their existing IntraLATA 1+ carrier, Express Communications, or to choose a different IntraLATA carrier for their 1+ service. The letter will include a list indicating all carriers in addition to the existing 1+ carrier that have chosen to participate in the IntraLATA toll presubscription process (a sample copy of the customer notifica ion letter that will be used is attached hereto as Appendix C). The list of carriers will include a toll free telephone number for each carrier listed.

Customers will be advised that if they choose a carrier other than their existing IntraLATA 1+ carrier, they must directly contact the long distance company that they've chosen in order to initiate that change. Those customers choosing to stay with their existing IntraLATA 1+ carrier, will not have to take any action. Their IntraLATA 1+ service will remain with their current provider.

Based on letters of agency received directly from participating carriers, Stateline Telecommunications, Inc., as of the date and time that IntraLATA dialing parity is implemented, will execute all necessary carrier selection changes.

Customers will not be charged for making any change to their IntraLATA 1+ carrier during the presubsco.ption process. In addition, customers will be advised that they will be given 60 days after the IntraLATA toll dialing parity implementation date to change their IntraLATA 1+ carrier at no charge.

Any preferred carrier freeze obtained by customers previously on their InterLATA 1+ service shall not be extended to prevent their participation in the IntraLATA toll prescribscription process. Any preferred carrier freeze on a customer's IntraLATA 1+ service shall be specifically authorized by the customer.

In the event that no access service requests are received and no carriers other than Express Communications choose to participate in the IntraLATA 1+ offering, Stateline Telecommunications, Inc. shall still provide notice to its subscribers that 1+ dialing parity for IntraLATA toll calls is available.

B. New customers.

New customers to Stateline Telecommunications, Inc.'s local exchange service, commencing such service after June 25, 1999, will be asked to choose both an IntraLATA and InterLATA carrier. They will be informed that regulations require that they choose a carrier for their IntraLATA 1+ service (for calls within this LATA) and also choose a carrier for their InterLATA 1+ service (for calls going outside this LATA). Stateline Telecommunications, Inc. will either inform or provide new customers a list of all carriers participating in IntraLATA 1+ services and all carriers participating in InterLATA 1+ services. Customer service representatives of Stateline Telecommunications, Inc. will reference the names of all carriers in the customer's exchange area providing 1+ toll service in the customer's exchange area. If the customer requests, the customer service representative will provide contact telephone numbers for the available carriers. Lists used by the customer service representatives will contain carriers' names in random order.

Customers applying for service will be encouraged to make a carrier selection. New customers will make an affirmative selection before they will be assigned to any carrier for either their IntraLATA 1+ or InterLATA 1+ service. New customers will be advised that neither IntraLATA 1+ dialed calls or InterLATA 1+ dialed calls originated from the customer's local line will be possible until a carrier selection is made. Until a selection is made, nonselecting customers will need to dial a carrier access code to make either IntraLATA or InterLATA toll calls. Stateline Telecommunications, Inc. upon being contacted by either new or existing customers and receiving requests for a preferred carrier or preferred carrier change shall not market its own IntraLATA 1+ service on that same call, but may answer customer initiated questions.

7. Request for approval of Plan.

Stateline Telecommunications, Inc. asks that the Commission grant its official approval of this Plan no earlier than June 22, 1999.

Dated this 16th day of June, 1999.

Respectfully submitted. dministrative Assistant ther.

Stateline Telecommunications, Inc. IntraLATA Dialing Parity Timeline

Carrier notifications completed by: June 1, 1999

Carrier responses due by: June 16, 1999

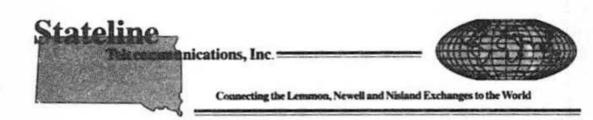
Customer notification completed by: June 25, 1999

Due date for customer response forms: July 12, 1999

IntraLATA dialing parity implementation date: July 22, 1999

End of 60 day grace period: September 20, 1999

E



APPENDIX A

TO: All Long Distance Carriers of Record in the State of South Dakota

Stateline Telecommunications, Inc. (ST) is pleased to announce the provisioning of IntraLATA equal access in certain local exchange areas. A list of these exchanges is attached. This service will be made available to customers on July 22, 1999.

It is ST's intent to work closely with all users of access and maintain an impartial position with regard to the end user's selection of an IntraLATA long distance carrier. ST will supply a PIC list for the end user's selection of an IntraLATA long distance carrier. However, because IntraLATA equal access will be provisioned via South Dakota Network (SDN) at 2900 West 10th Street, Sioux Falls, SD 57104, interconnection and access may be ordered via SDN.

Please complete and return the attached form if you wish to be a carrier of choice on the IntraLATA equal access PIC list for the exchanges listed on the next page.

Questions may be directed to Jerry Reisenauer at 605-244-5236.

You must return your request for participation postmarked no later than June 16, 1999, to:

Contact Name: Jerry Reisenauer Stateline Telecommunications, Inc. P.O. Box 39 Bison, SD 57620 Fax: 605-244-7288

Sincerely,

Darrell D. Henderson, General Manager

DH:ss

cc: Bill Bullard, South Dakota Public Utilities Commission

P. O. Box 39, Bison, SD 57620, Phone: 605-244-5236, kax: 605-244-7288

Stateline Telecommunications, Inc. exchanges to provide IntraLATA equal access:

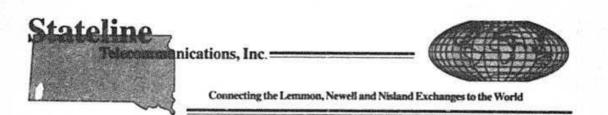
TOWN	NPA	NOCK
Nisland	605	257
Newell	605	456
Lemmon	605	374
Lemmon	701	376

INTRALATA PIC LIST PARTICIPATION FORM FOR STATELINE TELECOMMUNICATIONS, INC.

CARRIER NAME	
ACNA	
CIC	
BILLING ADDRESS	
BILLING CONTACT	
PHONE NUMBER	
FAX NUMBER	
E-MAIL ADDRESS	
CUSTOMER SERVICE	
NUMBER (BUSINESS)	
CUSTOMER SERVICE	
NUMBER (RESIDENCE)	
WOULD YOU LIKE TO	
BE INCLUDED ON THE	YES
INTRALATA PIC LIST	NO
SIGNATURE	
TITLE	
DATE	

Please respond by June 16, 1999

Stateline Telecommunications, Inc. P.O. Box 39 Bison, SD 57620



APPENDIX C

To: All Customers of Stateline Telecommunications, Inc.

Stateline Telecommunications, Inc. is pleased to announce that effective July 22, 1999, we will make it possible for you to choose from various long d tance companies for your in-state 1+ long distance service (IntraLATA long distance service). This service includes all of your intrastate long distance calls made by dialing 1 plus the area code and local telephone number. With these changes, you will have the ability to select a long distance company for your in-state 1+ long distance service.

In conjunction with making these changes, Stateline Telecommunications, Inc. is asking all of its local exchange subscribers to choose whether they wish to retain the current long distance company providing their in-state 1+ long distance service or select another company for the service.

Currently, Express Communications provides your in-state 1+ long distance service. This company will continue to provide service to you unless you select another carrier. If you do nothing, your in-state 1+ long distance service will remain with Express Communications.

Attached is a list of long distance companies, in addition to Express Communications, that have agreed to provide 1+ in-state long distance services in your area. If you wish to change your 1+ in-state (IntraLATA) long distance carrier, you must directly contact the long distance company that you've chosen in order to initiate that change.

You will not be charged for making a change to your existing in-state 1+ long distance service in response to this notice. In addition, for a period of 60 days after July 22, 1999, you may decide to change your in-state 1+ long distance carrier, one time, at no charge. After September 20, 1999, you will incur a Primary Interexchange Carrier (PIC) charge of \$5.00 for changing carriers.

Please call our office at 605-244-5236 if you have any questions on this matter.

Sincerely,

Darrell D. Henderson, General Manager

DDH:ss

P. O. Box 39, Bison, SD 57620, Phone: 605-244-5236, Fax: 605-244-7288

Listed below are the other long distance companies that are willing to offer you IntraLATA 1+ (generally in-state) long distance services. If you wish to change your IntraLATA 1+ long distance carrier, please directly contact the long distance company that you've chosen in order to initiate that change.

ABC Telephone Company, Inc. Bus/Res: 1-800-555-1234

LMNOP Telecommunications Bus: 1-800-555-2345

ZXC Telephone Company Bus Res: 1-800-555-3456

Please respond on or before July 12, 1999.

LIST

RECEIVED

IMPLEMENTATION PLAN FOR INTRALATA TOLL DIALING PARITY SOUTH DAKOTA PUBLIC

JUN 2 1 1993

UTILITIES COMMISSION Stockholm-Strandburg Telephone Co. (hereinafter referenced as "Stockholm-Strandburg) submits this Implementation Plan for IntraLATA Toll Dialing Parity (hereinafter referenced as "the Plan") pursuant to 47 C.F.R. § 51.213 and recent C Jers of the South Dakota Public Utilities Commission (hereinafter referenced as the "Commission") which require this filing on or before April 22, 1999. The purpose of the Plan is to provide information to the Commission concerning how and when Stockholm-Strandburg will convert to intraLATA toll dialing parity, or, as it is sometimes called, intraLATA equal access. The provisioning of such capability will permit customers to select which long distance carrier they want to handle their intraLATA 1+ calls.

1. Company name and address:

Stockholm-Strandburg Telephone Co., 210 N. Main St., Stockholm, SD 57264 Phone: 605-676-2311 605-676-2317 Fax:

2. Associated LATA:

Stockholm-Strandburg is located in and for purposes of this Plan associates with LATA 640.

3. Description of offering.

Stockholm-Strandburg will offer intraLATA toll dialing parity through the "full 2-PIC" presubscription software installed on a centralized basis at the access tandem switch of South Dakota Network, Inc. ("SDN"). The "full 2-PIC" method of presubscription allows a customer to presubscribe to one long distance carrier for all 1+ intraLATA toll calls and to presubscribe to the same or another long distance carrier for all 1+ interLATA toll calls. Directory assistance calls reached by dialing 1+ the telephone number are included in this intraLATA presubscription process. Because the intraLATA toll dialing parity capability will be provisioned via SDN at 2900 West 10th, Sioux Falls, SD 57104, interconnection and access necessary for participation in the offering may be ordered by long distance carriers via SDN.

4. Included local exchange areas and conversion date.

IntraLATA toll dialing parity through SDN will be made available in the following local exchange areas beginning July 22, 1999:

EXCHANGE	NPA	NXX
Revillo	605	623
South Shore	605	756
Stockholm	605	676

5. Interexchange carrier "carrier" notification.

All carriers certified in South Dakota to provide long distance services will be notified by June 1, 1999, of the conversion to intraLATA toll dialing parity (a sample copy of the carrier notification letter to be used is attached hereto as Appendix A). These carriers will be asked to respond by June 16, 1999, if they want to participate in the intraLATA toll presubscription process (a sample copy of the form which carriers will complete to indicate their participation in the presubscription process is attached hereto as Appendix B). Carriers that choose to participate in the presubscription process, shall submit verified preferred carrier change orders to Stockholm-Strandburg to effectuate requests by subscribers for their intraLATA toll service.

Stockholm-Strandburg will make available preconversion customer name and address lists. These customer lists are available to assist participating carriers in their presubscription solicitation efforts. These lists may be provided subject to a reasonable, non-discriminatory fee, with delivery contingent upon the carrier meeting all requirements for participation in the intraLATA presubscription process.

6. Customer notification.

A. Current customers.

Customers, including payphone service providers, will be notified of the conversion to intraLATA toll dialing parity by letter postmarked no later than June 25, 1999. In such letter, customers will be advised of their intraLATA choices. Customers will be given the option to remain with their existing intraLATA 1+ carrier, Express Communications d.b.a. Stockholm-Strandburg Long Distance, or to choose a different intraLATA carrier for their 1+ service. The letter will include a list indic uting all carriers in addition to the existing 1+ carrier that have chosen to participate in the intraLATA toll presubscription process (a sample copy of the customer notification letter that will be used is attached hereto as Appendix C). The list of carriers will include a toll free telephone number for each carrier listed.

Customers will be advised that if they choose a carrier other than their existing intraLATA 1+ carrier, they must directly contact the long distance company that they've chosen in order to initiate that change. Those customers choosing to stay with their existing intraLATA 1+ carrier, will not have to take any action. Their intraLATA 1+ service will remain with their current provider. Based on the letters of agency received directly from participating carriers, Stockholm-Strandburg, as of the date and time that intraLATA dialing parity is implemented, will execute all necessary carrier selection changes.

Customers will not be charged for making any change to their intraLATA 1+ carrier during the presubscription process. In addition, customers will be advised that they will be given 60 days after the intraLATA toll dialing parity implementation date to change their intraLATA 1+ carrier at no charge.

Any preferred carrier freeze obtained by customers previously on their interLATA 1+ service shall not be extended to prevent their participation in the intraLATA toll presubscription process. Any preferred carrier freeze on a customer's intraLATA 1+ service shall be specifically authorized by the customer.

In the event that no access service requests are received and no carriers other than Express Communications d.b.a. Stockholm-Strandburg Long Distance choose to participate in the intraLATA 1+ offering, Stockholm-Standburg shall still provide notice to its subscribers that 1+ dialing parity for intraLATA toll calls is available.

B. New customers.

New customers to Stockholm-Strandburg's local exchange service, commencing such service after June 25, 1999, will be asked to choose both an intraLATA and interLATA carrier. They will be informed that regulations require that they choose a carrier for their intraLATA 1+ service (for calls within this LATA) and also choose a carrier for their interLATA 1+ service (for calls going outside this LATA). Stockholm-Strandburg will either inform or provide new customers a list of all carriers participating in intraLATA 1+ services and all carriers participating in interLATA 1+ services. Customer service representatives of Stockholm-Strandburg will reference the names of all carriers in the customer's exchange area providing 1+ toll service. If the customer requests, the customer service representative will provide contact telephone numbers for the available carriers. Lists used by the customer service representatives will contain carriers' names in random order.

Customers applying for service will be encouraged to make a carrier selection. New customers will make an affirmative selection before they will be assigned to any carrier for either their intraLATA 1+ or interLATA 1+ service. New customers will be advised that neither intraLATA 1+ dialed calls or interLATA 1+ dialed calls originated from the customer's local line will be possible until a carrier selection is made. Until a selection is made, non-selecting customers will need to dial a carrier access code to make either intraLATA or interLATA toll calls.

Stockholm-Strandburg upon being contacted by either new or existing customers and receiving requests for a preferred carrier or preferred carrier change shall not market its own intraLATA 1+ service on that same call, but may answer customer initiated questions. 7. Request for approval of Plan.

Stockholm-Strandburg asks that the Commission grant its official approval of this Plan no earlier than June 22, 1999.

Dated this 16th day of June, 1999.

Respectfully submitted,

Hardle nowil

Manager, Stockholm-Standburg Telephone Co.

Stockholm-Strandburg IntraLATA Dialing Parity Timeline

Carrier notifications completed by: June 1, 1999

Carrier responses due by: June 16, 1999

Customer notification completed by: June 25, 1999

Due date for customer response forms: July 12, 1999

IntraLATA dialing parity implementation date: July 22, 1999

End of 60 day grace period: September 20, 1999

Ċ.

APPENDIX A

Date May 28, 1999

TO: All Long Distance Carriers of Record in the State of South Dakota

Stockholm-Strandburg Telephone Co. (Stockholm-Strandburg) is pleased to announce the provisioning of IntraLATA equal access in certain local exchange areas. A list of these exchanges is attached. This service will be made available to customers on July 22, 1999.

It is Stockholm-Strandburg's intent to work closely with all users of access and maintain an impartial position with regard to the end user's selection of an IntraLATA long distance carrier. Stockholm-Strandburg will supply a PIC list for the end user's selection of an IntraLATA long distance carrier. However, because IntraLATA equal access will be provisioned via South Dakota Netwo. k (SDN) at 2900 West 10th Street, Sioux Falls, SD 57104, interconnection and access may be ordered via SDN.

Please complete and return the attached form if you wish to be a carrier of choice on the IntraLATA equal access PIC list for the exchanges listed on the next page.

Questions may be directed to Jan Christensen at Martin and Associates, Inc., 605-995-2576. Technical questions may be directed to Tim Nowick at Stockholm-Strandburg Telephone Co., 605-676-2311.

You must return your request for participation postmarked no later than June 16, 1999, to:

Janice Christensen Martin and Associates, Inc. 1515 N. Sanborn Boulevard Mitchell, SD 57301 Fax: 605-995-2577

6

Sincerely,

Name

cc: Bill Bullard, South Dakota Public Utilities Commission Harold Nowick, Stockholm Strandburg Telephone Co.

Stockholm-Strandburg Telephone Co. exchanges to provide IntraLATA equal access:

TOWN	NPA	NXX
Revillo	605	623
South Shore	605	756
Stockholm	605	676

APPENDIX B

INTRALATA PIC LIST PARTICIPATION FORM FOR STOCKHOLM-STRANDBURG TELEPHONE CO.

0154 .30 .481

CARRIER NAME	
ACNA	
CIC	
BILLING ADDRESS	
BILLING CONTACT	
PHONE NUMBER	
FAX NUMBER	
E-MAIL ADDRESS	
CUSTOMER SERVICE NUMBER (BUSINESS)	
CUSTOMER SERVICE NUMBER (RESIDENCE)	
WOULD YOU LIKE TO BE INCLUDED ON THE INTRALATA PIC LIST?	YES NO
SIGNATURE	
TITLE	
DATE	

Please respond by June 16, 1999.

Janice Christensen Martin and Associates, Inc. 1515 N. Sanborn Boulevard Mitchell, SD 57301 Fax: 605-995-2577 Date:

To: All Customers of Stockholm-Strandburg Telephone Co.

Stockholm-Strandburg Telephone Co. is pleased to announce that effective July 22, 1999, we will make it possible for you to choose from various long distance companies for your in-state 1+ long distance service (intraLATA long distance service). This service includes all of your intrastate long distance calls made by dialing 1 plus the area code and local telephone number. With these changes, you will have the ability to select a long distance company for your in-state 1+ long distance service.

In conjunction with making these changes, Stockholm-Strandburg Telephone Co. is asking all of its local exchange subscribers to choose whether they wish to retain the current long distance company providing their in-state 1+ long distance service or select another company for the service.

Currently, Express Communications d.b.a. Stockholm-Strandburg Long Distance provides your instate 1+ long distance service. This company will continue to provide service to you unless you tell us to make a change and select another carrier. If you do nothing, your in-state 1+ long distance service will remain with Stockholm-Strandburg Long Distance.

Attached is a list of long distance companies, in addition to Stockholm-Strandburg Long Distance, that have agreed to provide 1+ in-state long distance services in your area. If you wish to change your 1+ in-state (intraLATA) long distance carrier, you must directly contact the long distance company that you've chosen in order to initiate that change.

You will not be charged for making a change to your existing in-state 1+ long distance service in response to this notice. In addition, for a period of 60 days after July 22, 1999, you may decide to change your in-state 1+ long distance carrier, one time, at no charge. After September 20, 1999, you will incur a Primary Interexchange Carrier (PIC) charge of \$5.00 for changing carriers.

Please call our office at 605-676-2311 if you have any questions on this matter.

Sincerely,

Stockholm-Strandburg Telephone Co.

LIST

Listed below are the other Long Distance companies that are willing to offer you IntraLATA 1+ (generally in-state) long distance services. If you wish to change your intraLATA 1+ long distance carrier, please directly contact the long distance company that you've chosen in order to initiate that change.

ABC Telephone Company, Inc. Bus/Res: 1-800-555-1234

LMNOP Telecommunications Bus: 1-800-555-2345

ZXC Telephone Company Bus/Res: 1-800-555-3456

Please respond on or before July 12, 1999.



RECEIVED

June 16, 1999

JUN 17 1999

Bill Bullard, Executive Director South Dakota Public Utilities Commission State Capitol Building 500 East Capitol Ave. Pierre, South Dakota 57501 SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

RE: Docket TC99-030 (Implementation Plan for IntraLATA Dialing Parity)

Dear Bill:

Enclosed for filing in the above referenced Docket is the "Revised Implementation Plan for IntraLATA Toll Dialing Parity" of Splitrock Properties, Inc.

Please note that we have indicated a date for sending carrier notification letters that is in advance of the requested plan approval date. We've done this because of certain language in the FCC's March 23rd IntraLATA Dialing Parity Order, FCC 99-54, which indicates that LECs must implement intraLATA dialing parity within 30 days after approval of their implementation plan. This would seem to mean that the actual conversion to dialing parity should be accomplished within 30 days after this Commission approves the plan. Given this very short timeline, if LEC's are not able to start the carrier notification process in advance of final Commission action on the plan, almost no time would be left for notifying and receiving responses from customers.

We are therefore, along with requesting approval of this filed plan, asking that the Commission grant us approval in advance of its final action on the plan to send out carrier notification letters. A sample copy of the carrier notification letter proposed for use is attached to the implementation plan as Appendix A. A sample copy of the proposed carrier participation form to be used is included with the plan as Appendix B.

If Commission Staff or the Commissioners desire any additional information to supplement this filing, please advise.

Thank you for your assistance in filing and distributing these documents.

ncere

Don Snyders, Manager Splitrock Properties, Inc.

P.O. Box 349 Garretson, SD 57030 Phone: 605-594-3411 Fax: 605-594-6776 Howard: 605-772-4644 Oldham: 605-482-9644

IMPLEMENTATION PLAN FOR INTRALATA TOLL DIALING PARITY

Splitrock Properties, Inc. submits this Implementation Plan for IntraLATA Toll Dialing Parity (hereinafter referenced as "the Plan") pursuant to 47 C.F.R. § 51.213 and recent Orders of the South Dakota Public Utilities Commission (hereinafter referenced as the "Commission") which require this filing on or before April 22, 1999. The purpose of the Plan is to provide information to the Commission concerning how and when Splitrock Properties, Inc. will convert to intraLATA toll dialing parity, or, as it is sometimes called, intraLATA equal access. The provisioning of such capability will permit customers to select which long distance carrier they want to handle their intraL. TA 1+ calls.

1. Company name and address:

Splitrock Properties, Inc, 612 Third St, PO Box 349, Garretson, SD 57030, 605-594-3411, 605-594 6776 (fax)

2. Associated LATA:

Splitrock Properties, Inc. is located in and for purposes of this Plan associates with LATA 640.

3. Description of offering.

Splitrock Properties, Inc. will offer intraLATA toll dialing parity through the "full 2-PIC" presubscription software installed on a centralized basis at the access tandem switch of South Dakota Network, Inc. ("SDN"). The "full 2-PIC" method of presubscription allows a customer to presubscribe to one long distance carrier for all 1+ intraLATA toll calls and to presubscribe to the same or another long distance carrier for all 1+ interLATA toll calls. Directory assistance calls reached by dialing 1+ the telephone number are included in this intraLATA presubscription process. Because the intraLATA toll dialing parity capability will be provisioned via SDN at 2900 West 10th, Sioux Falls, SD 57104, interconnection and access necessary for participation in the offering may be ordered by long distance cariers via SDN.

4. Included local exchange areas and conversion date.

IntraLATA toll dialing parity through SDN will be made available in the following local exchange areas beginning July 22, 1999:

> Howard/Carthage - 605 - 772 Oldham/Ramona - 605 - 482

5. Interexchange carrier "carrier" notification.

All carriers certified in South Dakota to provide long distance services will be notified by June 1, 1999, of the conversion to intraLATA toll dialing parity (a sample copy of the carrier notification letter to be used is attached hereto as Appendix A). These carriers will be asked to respond by June 16, 1999, if the y want to participate in the intraLATA toll presubscription process (a sample copy of the forn which carriers will complete to indicate their participation in the presubscription process is attached hereto as Appendix B). Carriers that choose to participate in the presubscription process, shall submit verified perferred carrier change orders to Splitrock Properties, Inc. to effectuate requests by subscribers for their intraLATA toll service.

Splitrock Properties, Inc. will make available preconversion customer name and address lists. These customer lists are available to assist participating carriers in their presubscription solicitation efforts. These lists may be provided subject to a reasonable, non-discriminatory fee, with delivery contingent upon the carrier meeting all requirements for participation in the intraLATA presubscription process.

6. Customer notification.

A. Current customers.

Customers, including payphone service providers, will be notified of the conversion to intraLATA toll dialing parity by letter postmarked no later than June 25, 1999. In such letter, customers will be advised of their intraLATA choices. Customers will be given the option to remain with their existing intraLATA 1+ carrier, [provide name of current 1+ intraLATA carrier], or to choose a different intraLATA carrier for their 1+ service. The letter will include a list indicating all carriers in addition to the existing 1+ carrier that have chosen to participate in the intraLATA toll presubscription process (a sample copy of the customer notification letter that will be used is attached hereto as Appendix C). The list of carriers will include a toll free telephone number for each carrier listed.

Customers will be advised that if they choose a carrier other than their existing intraLATA 1+ carrier, they must directly contact the long distance company that they've chosen in order to initiate that change. Those customers choosing to stay with their existing intraLATA 1+ carrier, will not have to take any aciton. Their intraLATA 1+ service will remain with their current provider. Based on letters of agency received directly from participating carriers. Splitrock Properties, Inc., as of the date and time that intraLATA dialing parity is implemented, will execute all necessary carrier selection changes.

Customers will not be charged for making any change to their intraLATA 1+ carrier during the presubscription process. In addition, customers will be advised that they will be given 60 days after the intraLATA toll dialing parity implementation date to change their intraLATA 1+ carrier at no charge. Any preferred carrier freeze obtained by customers previously on their interLATA 1+ service shall not be extended to prevent their participation in the intraLATA toll presubscription process. Any perferred carrier freeze on a customer's intraLATA 1+ service shall be specifically authorized by the customer.

In the event that no access service requests are received and no carriers other than Splitrock Long Distance choose to participate in the intraLATA 1+ offering, Splitrock Properties, Inc. shall still provide notice to its subscribers that 1+ dialing parity for intraLATA toll calls is available.

B. New customers.

New customers to Splitrock Properties, Inc.'s local exchange service, commencing such service after July 22, 1999, will be asked to choose both an intraLATA and interLATA carrier. They will be informed that regulations require that they choose a carrier for their intraLATA 1+ service (for calls within this LATA) and also choose a carrier for their interLATA 1+ service (for calls going outside this LATA). Splitrock Properties, Inc. will either inform or provide new customers a list of all carriers participating in intraLATA 1+ services and all carriers participating in interLATA 1+ services. Customer service representatives of Splitrock Properties, Inc. will reference the names of all carriers in the customer's exchange area providing 1+ toll service in the customer's exchange area. If the customer requests, the customer service representative will provide contact telephone numbers for the available carriers. Lists used by the customer service representatives will contain carriers' names in random order.

Customers applying for service will be encouraged to make a carrier selection. New customers will make an affirmative selection before they will be assigned to any carrier for either their intraLATA 1+ or interLATA 1+ service. New customers will be advised that neither intraLATA 1+ dialed calls or interLATA 1+ dialed calls originated from the customer's local line will be possible until a carrier selection is made. Until a selection is made, non-selecting customers will need to dial a carrier access code to make either intraLATA or interLATA toll calls.

Splitrock Properties, Inc. upon being contacted by either new or existing customers and receiving requests for a preferred carrier or preferred carrier change shall not market its own intraLATA 1+ service on that same call, but may answer customer initiated questions.

7. Request for approval of Plan.

Splitrock Properties, Inc. asks that the Commission grant its official approval of this Plan no earlier than June 22, 1999.

Dated this 16th day of June, 1999.

Respectfully submitted Don Snyders, Manager

Splitrock Properties, Inc.

Splitrock Properties, Inc. IntraLATA Dialing Parity Timeline

Carrier notifications completed by: June 1, 1999

Carrier responses due by: June 16, 1999

Customer notification completed by: June 25, 1999

Due date for customer response forms: July 12, 1999

IntraLATA dialing parity implementation date: July 22, 1999

End of 60 day grace period: September 20, 1999

APPENDIX A

Date June 16, 1999

TO: All Long Distance Carriers of Record in the State of South Dakota

Splitrock Properties, Inc. is pleased to announce the provisioning of IntraLATA equal access in certain local exchange areas. A list of these exchanges is attached. This service will be made available to customers on July 22, 1999.

It is Splitrock Properties, Inc.'s intent to work closely with all users of access and maintain an impartial position with regard to the end user's selection of an IntraLATA long distance carrier. Splitrock Properties, Inc. will supply a PIC list for the end user's selection of an IntraLATA long distance carrier. However, because IntraLATA equal ac iss will be provisioned via South Dakota Network (SDN) at 2900 West 10th Street, Sioux Falls, SD 57104, interconnection and access may be ordered via SDN.

Please complete and return the attached form if you wish to be a carrier of choice on the IntraLATA equal access PIC list for the exchanges listed on the next page.

Questions may be directed to Don Snyders at 605-594-3411.

You must return your request for participation postmarked no later than June 16, 1999, to:

Don Snyders Splitrock Properties, Inc. PO Box 349 Garretson, SD 57030 605-594-6776 (Fax)

Sincerely,

Don Snyders, Manager

cc: Bill Bullard, South Dakota Public Utilities Commission

Splitrock Properties,	Inc. exchanges
to provide IntraLATA	equal access:

TOWN	NPA	NXX
Howard/Carthage	605	772
Oldham/Ramona	605	482

APPENDIX B

INTRALATA PIC LIST PARTICIPATION FORM FOR SPLITROCK PROPERTIES, INC.

CARRIER NAME		
ACNA		
CIC		
BILLING ADDRESS		
BILLING CONTACT		
PHONE NUMBER		
FAX NUMBER		
E-MAIL ADDRESS		
CUSTOMER SERVICE NUMBER (BUSINESS)		
CUSTOMER SERVICE NUMBER (RESIDENCE)		
WOULD YOU LIKE TO BE INCLUDED ON THE INTRALATA PIC LIST?	YES NO	
SIGNATURE		
TITLE		
DATE		

Please respond by June 16, 1999. Address: Don Snyders Splitrock Properties, Inc. PO Box 349, Garretson, SD 57030

APPENDIX C

Date: June 16, 1999

To: All Customers of Splitrock Properties, Inc.

Splitrock Properties, Inc. is pleased to announce that effective July 22, 1999, we will make it possible for you to choose from various long distance companies for your in-state 1+ long distance service (intraLATA long distance service). This service includes all of your intrastate long distance calls made by dialing 1 plus the area code and local telephone number. With these changes, you will have the ability to select a long distance company for your in-state 1+ long distance service.

In conjunction with making these changes, Splitrock Properties, Inc. is asking all of its local exchange subscribers to choose whether they wish to retain the current long distance company providing their in-state 1+ long distance service or select another company for the service.

Currently Splitrock Long Distance provides your in-state 1+ long distance service. This company will continue to provide service to you unless you select another carrier. If you do nothing, your instate 1+ long distance service will remain with Splitrock Long Distance.

Attached is a list of long distance companies, in addition to Splitrock Long Distance that have agreed to provide 1+ in-state long distance services in your area. If you wish to change your 1+ instate (intraLATA) long distance carrier, you must directly contact the long distance company that you've chosen in order to initiate the change.

You will not be charged for making a change to your existing in-state 1+ long distance service in response to this notice. In addition, for a period of 60 days after July 22, 1999, you may decide to change your in-state 1+ long distance carrier, one time, at no charge. After September 20, 1999, you will incur a Primary Interexchange Carrier (PIC) charge of \$5.00 for changing carriers.

Please call our office at 605-772-4644 if you have any questions on this matter.

Sincerely.

Splitrock Properties, Inc.

LIST

Listed below are the other Long Distance companies that are willing to offer you IntraLATA 1+ (generally in-state) long distance services. If you wish to change your intraLATA 1+ long distance c_rrier, please directly contact the long distance company that you've chosen in order to initiate that change.

(Examples):

ABC Telephone Company, Inc. Bus/Res: 1-800-555-1234

LMNOP Telecommunications Bus: 1-800-555-2345

ZXC Telephone Company Bus/Res: 1-800-555-3456

Please respond on or before July 12, 1999.

TELEC CONSULTING RESOURCES &

909 N. 96th Street, Suite 203 Omaha, NE 68114-2508 (402) 396-0062 FAX (402) 398-0065

Cornhusker Plaza 301 South 13th Street, Suite 401 Lincoln, NE 68508 (402) 441-4315 FAX (402) 441-4317

June 16, 1999

RECEIVED

Mr. Bill Bullard, Executive Director South Dakota Public Utilities Commission State Capitol Building 500 East Capitol Avenue Pierre, South Dakota 57501

JUN 17 1999

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

RE: Docket TC99-030/Implementation Plan for IntraLATA Dialing Parity

Dear Mr. Bullard:

On behalf of our client, Jefferson Telephone Company (Jefferson), we are filing an amendment to its intraLATA toll dialing parity implementation plan.

Per the requirements of the South Dakota Public Utilities Commission (SDPUC) order issued June 15 in the above referenced docket, we are adding information specifically addressing the following:

- I+ Directory Assistance Calls see item 3 of the Description of Plan
- PIC Freeze Authorization see item 7 of the Description of Plan
- LEC Marketing Prohibitions see item 6 of the Description of Plan

We have enclosed the corrected Description of Plan pages.

Please give Loretta Calabro or me a call at (402)398-0062 with any questions you may have on this filing.

Thank you.

Sincerely,

Lee Darrington enc

cc: Tom Connors, Jefferson Telephone Company

JEFFERSON TELEPHONE COMPANY INTRALATA DIALING PARITY IMPLEMENTATION PLAN

Jefferson Telephone Company submits this implementation plan for intraLATA dialing parity (the Plan) pursuant to 47 C.F.R. 51.213, FCC Order 99-54, and South Dakota Public Utilities Commission (Commission) Docket TC99-030. The purpose of the Plan is to provide information to the Commission on how and when Jefferson Telephone Company (Jefferson) will convert to intraLATA dialing parity, or, as it is sometimes called, intraLATA equal access. The provisioning of this capability will allow customers to select whichever long distance carrier they want to handle their intraLATA 1+ calls.

1. Company name and address:

Jefferson Telephone Company 311 Main Street P.O. Box 128 Jefferson, SD 57038-0128

2. Associated LATA:

South Dakota LATA, LATA 640

3. Description of offering:

Jefferson Telephone Company will offer intraLATA dialing parity through the full 2-PIC presubscription software installed on a centralized basis at the access tandem switch of South Dakota Network, Inc. (SDN). The full 2-PIC method of presubscription allows a customer to presubscibe to one long distance carrier for all 1+ intraLATA toll calls and to presubscribe to the same or to another long distance carrier for all 1+ intraLATA toll calls. 1+ Directory Assistance calls are included in this presubscription process. Because the intraLATA dialing parity capability will be provisioned via SDN at 2900 West 10th, Sioux Falls, SD 57104, interconnection and access necessary for participation in the offering may be ordered by long distance carriers via SDN.

4. Included local exchange area and conversion date:

IntraLATA toll dialing parity through SDN will be available in the following local exchange area beginning July 15, 1999:

Exchange	NPA	NXX
Jefferson, South Dakota	(605)	966

5. Interexchange carrier (carrier) notification:

All carriers certified in South Dakota to provide long distance services will be notified by May 14, 1999, of the conversion to intraLATA toll dialing parity. (Please see Attachment A.) These carriers will be asked to respond by June 7, 1999, if they want to participate in the intraLATA toll presubsciption process. (See Attachment B.)

Jefferson Telephone Company will make available, upon request, preconversion customer name and address lists to participating carriers that meet all requirements for participation in the intraLATA presubsciption process.

6. Customer notification:

Jefferson Telephone Company, upon being contacted by either new or existing customers requesting a preferred carrier selection or change, will not market its products or services on that same call, but will answer customer initiated questions.

A. Current customers:

Customers will be notified of the conversion to intraLATA toll dialing parity by letter by June 25, 1999. (Please see Attachment C.) Included in this letter will be a list of participating carriers. In the letter, customers will be advised that they may remain with their existing intraLATA 1+ carrier or choose a different carrier from the list of participating carriers. Customers will be advised to contact the carrier of their choice when choosing a carrier other than their existing carrier, those customers choosing to stay with their existing carrier need take no action and Express Communications will automatically remain their intraLATA carrier. Based on the changes received from participating carriers, Jefferson Telephone Company will execute all necessary carrier selection changes as of July 15, 1999. Customers will not be charged for making any change to their intraLATA 1+ carrier selection during the presubscription process. In addition, customers will be advised that they will be given a 60 day grace period after the implementation date to change their intraLATA 1+ carrier, one time, at no charge. After the 60 day grace period, a one-time \$5.00 charge will apply to such a change, just as it does today for making an interLATA 1+ carrier change. All residence, business, and payphone provider customers will be included in this process.

B. New customers:

New customers applying for local service from Jefferson Telephone Company after June 15, 1999, will be asked to choose both an interLATA and intraLATA carrier. They will be advised that this may or may not be the same carrier and will choose from the respective lists of participating carriers. Lists used by customer service representatives will contain participating carriers' names in random order. Upon customer request, customer service representatives will provide contact telephone numbers for customers to use in contacting carriers. Customers applying for service will be encouraged to make carrier selections and will be advised that neither intraLATA 1+ nor interLATA 1+ calls can be made form their local line until selections are made. Until selections are made, customers will have to dial a carrier access code to make 1+ calls.

7. PIC Freeze:

4

.30

.498

Customers who currently have an interLATA PIC freeze must give Jefferson Telephone Company a separate authorization to freeze their intraLATA PIC. New customers wanting PIC freeze must give Jefferson Telephone Company two PIC freeze authorizations; one for their interLATA PIC and one for their intraLATA PIC.

8. Request for approval of plan:

Jefferson Telephone Company asks that the Commission grant its official approval of this plan on June 22, 1999.

Dated this 16th day of June, 1999.

Respectfully submitted,

Lee Darrington

TELEC Consulting Resources, Inc. on behalf of Jefferson Telephone Company

SIGHT SHELLY BUTTES TELEVICIE COOPERATIVE, INC. YEAT ON A STATE OF THE STATE OF THE STATE COMMENSION OF THE STATE OF THE S	FAX
To:	FROM: Janici
Fan 605-173-3809	PAGES: 10
PHONE:	DATE: 6/17/99
	1

If you have not received legible copies or did not receive the full transmission, please call Janice Volsk at 605-652-2224

apies	today.	mail	origin	4 4	ten
appending.	and a				
		She	ento!		
		6	antes!		
		V			

THE INFORMATION CONTAINED IN THIS FACSIMILE MESSAGE IS PRIVILEGED AND CONFIDENTIAL INFORMATION INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY NAMED AS RECIPIENT. IF THE READER IS NOT THE INTENDED RECIPIENT, NOTICE IS HEREBY GIVEN THAT ANY DISSEMINATION OR COPYING OF THIS COMMUNICATION IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS COMMUNICATION IN EPHROR PLEASE NOTIFY US IMMEDIATELY BY TELEPHONING US COLLECT AT THE ABOVE PHONE NUMBER.

> PO Box 157 • 219 Commercial Ave SE • Highmore, SD 57345 Phone: 605-863-2224 • Fex: 605-862-2404

NO.177 P.2/11



June 17, 1999

Bill Bullard, Executive Director South Dakota Public Utilities Commission State Capitol Building 500 East Capitol Ave. Pierre, SD 57501

RE: Docket TC99-030 (Revised Implementation Plan for IntraLATA Dialing Parity)

Dear Bill:

Enclosed for filing is VCT's revised version of our "Implementation Plan for IntraLATA Toll Dialing Parity."

We hope this will meet your requirements and look forward to hearing from you in the near future. Should you have any questions, please feel free to call upon us.

Sincerely,

VENTURE COMMUNICATIONS, INC.

Kandy Houder by ge

General Manager

'JUN. 17. 1999 1:45PM SBTC/VCI 16058522404

IMPLEMENTATION PLAN FOR INTRALATA TOLL DIALING PARITY

Venture Communications, Inc. submits this Implementation Plan for IntraLATA Toll Dialing Parity (hereinafter referenced as "the Plan") pursuant to 47 C.F.R. § 51.213 and recent Orders of the South Dakota Public Utilities Commission (hereinafter referenced as the "Commission") which require this filing on or before April 22, 1999. The purpose of the Plan is to provide information to the Commission concerning how and when Venture Communications, Inc. will convert to intraLATA toll dialing parity, or, as it is sometimes called, intraLATA equal access. The provisioning of such capability will permit customers to select which long distance carrier they want '2 handle their intraLATA 1+ calls.

1. Company name and address:

Venture Communications Inc. 218 Commercial SE PO Box 157 Highmore, SD 57345 Phone number: 605-8 Fax Number: 605-8

605-852-2224 605-852-2404

2. Associated LATA:

Venture Communications, Inc. is located in and for purposes of this Plan associates with LATA 640.

3. Description of offering.

Venture Communications, Inc. will offer intraLATA toll dialing parity through the "full 2-PIC" presubscription software installed on a centralized basis at the access tandem switch of South Dakota Network, Inc. ("SDN"). The "full 2-PIC" method of presubscription allows a customer to presubscribe to one long distance carrier for all 1+ intraLATA toll calls and to presubscribe to same or another long distance carrier for all 1+ interLATA toll calls. Directory assistance calls reached by dialing 1+ the telephone number are included in this intraLATA presubscription process. Because the intraLATA toll dialing parity capability will be provisioned via SDN at 2900 West 10th, Sioux Falls, SD 57104, interconnection and access necessary for participation in the offering may be ordered by long distance carriers via SDN.

4. Included local exchange areas and conversion date.

IntraLATA toll dialing parity through SDN will be made available in the following local exchange areas beginning July 22, 1999:

North Britton	701-443	Pierpont	605-325
Britton	605-448	Roscoe	605-287
Bowdle	605-285	Roslyn	605-486
Gentysburg	605-765	Selby	605-649
Lebanoa	605-768	Wess. Sprin	1gs 605-539
Onida	605-258		-

5. Interexchange carrier "carrier" potification.

All carriers certified in South Dakota to provide long distance services will be notified by June 1, 1999, of the conversion to intraLATA toll dialing parity (a sample copy of the carrier notification letter to be used is attached hereto as Appendix A). These carriers will be asked to respond by June 16, 1999, if they want to participate in the intraLATA toll presubscription process (a sample copy of the form which carriers will complete to indicate their participation in the presubscription process is attached hereto as Appendix B). Carriers that choose to participate in the presubscription process, shall submit verified preferred carrier change orders to Venture Communications, Inc. to effectuate requests by subscribers for their intraLATA toll service.

Venture Communications, Inc. will make available pre-conversion customer name and address lists upon the request of the long distance carrier. These customer lists are available to assist participating carriers in their presubscription solicitation efforts. These lists may be provided subject to a reasonable, discriminatory fee, with delivery contingent upon the carrier meeting all requirements for participation in the intraLATA presubscription process.

6. Customer notification.

A. Current customers.

Customers, including psyphone service providers, will be notified of the conversion to intraLATA toll dialing parity by letter postmarked no later than June 25, 1999. In such letter, customers will be advised of their intraLATA choices. Customers will be given the option to remain with their existing intraLATA 1+ carrier, Sully Buttes Long Distance, or to choose a different intraLATA carrier for their 1+ service. The letter will include a list indicating all curriers in addition to the existing 1+ carrier that have chosen to participate in the intraLATA toll presubscription process (a sample copy of the customer notification letter that will be used is attached hereto as Appendix C). The list of carriers will include a toll free telephone number for each carrier listed.

Customers will be advised that if they choose a carrier other than their existing intraLATA 1+ carrier, they must directly contact the long distance company they have chosen in order to initiate that change. Those customers choosing to stay with their existing intraLATA 1+ carrier, will not have to take any action. Their intraLATA 1+ service will remain with their current provider. Based on letters of agency received directly from participating carriers. Venture Communications, Inc., as of the date and time that intraLATA dialing parity is implemented, will execute all necessary carrier selection changes.

Customers will not be charged for making any change to their intraLATA 1+ carrier during the presubscription process. In addition, customers will be advised that they will be given 60 days after the intraLATA toll dialing parity implementation date to change their intraLATA 1+ carrier at no charge. JUN. 17. 1999 1:47PM SBTC/VCI 16058522404

NO.177 P.5/11

Any preferred carrier freeze obtained by the customers previously on their interLATA 1+ service shall not be extended to prevent their participation in the intraLATA toll presubscription process. Any preferred carrier freeze on customer's intraLATA 1+ service shall be specifically authorized by the customer.

In the event that no access service requests are received and no carriers other than Sully Buttes Long Distance choose to participate in the intraLATA 1+ offering, Venture Communications, Inc. shall still provide notice to lits subscribers that 1+ dialing parity for intraLATA toll calls is available.

B. New customers.

New customers to Venture Communications, Inc.'s local exchange service, commencing such service after June 25, 1999, will be asked to choose both an intraLATA and interLATA carrier. They will be informed that regulations require that they choose a carrier for their intraLATA 1+ service (for calls within this LATA) and also choose a carrier for their interLATA 1+ service (for calls going outside this LATA). Venture Communications, Inc. will either inform or provide new customers a list of all carriers participating in intraLATA 1+ services and all carriers participating in interLATA 1+ services. Customer service representatives of Venture Communications, Inc. will reference the names of all carriers in the customer's exchange area providing 1+ toll service. If the customer requests, the customer service representative will provide contact telephone numbers for the available carriers. Lists used by the customer service representatives will contain carriers' names in random order.

Customers applying for service will be encouraged to make a carrier selection. New customers will make an affirmative selection before they will be assigned to any carrier for either their intraLATA 1+ or interLATA 1+ service. New customers will be advised that neither intraLATA 1+ dialed calls or interLATA 1+ dialed calls originated from the customer's local line will be possible until a carrier selection is made.

Venture Communications, Inc. upon being contacted by either new or existing customers and receiving requests for a preferred carrier or preferred carrier change shall not market its own intraLATA 1+ service on that same call, but may answer customer initiated questions.

7. Request for approval of Plan.

Venture Communications, Inc. asks that the Commission grant its official approval of this Plan no earlier than June 22, 1999.

Dated this 17th day of June, 1999.

Respectfully submitted,

Randy W. Houdek Manager, Venture Communications, Inc. JUN. 17. 1999 1:49PM SBTC/VCI 16858522484

ł

Venture Communications, Inc. IntraLATA Dialing Parity Timeline

Carrier notifications completed by: June 1, 1999

Carrier responses due by: June 16, 1999

Customer notification completed by: June 25, 1999

Due date for customer response forms: July 12, 1999

IntraLATA dialing parity implementation date: July 22, 1999

End of 60 day grace period: September 20, 1999

JUN. 17. 1999 1:49FM SBTC/VCI 16058522404

5

APPENDIX A

Dato

TO: All Long Distance Carriers of Record in the State of South Dakota

Venture Communications, Inc. is pleased to announce the provisioning of IntraLATA equal access in certain local exchange areas. A list of these exchanges is attached. This service will be made available to customers on July 22, 1999.

It is Venture Communications, Inc.'s intent to work closely with all users of access and maintain an impartial position with regard to the end user's selection of an IntraLATA long distance carrier. Venture Communications will supply a PIC list for the end user's selection of an IntraLATA long distance carrier. However, because IntraLATA equal access will be provisioned via South Dakota Network (SDN) at 2900 West 10th Street, Sioux Falls, SD 57104, interconnection and access service requests may be ordered via SDN.

Please complete and return the attached form if you wish to be a carrier of choice on the IntraLATA equal access PIC list for the exchanges listed on the next page.

FAX # 605-334-4782

Questions may be directed to Chuck Fejfar at 800-247-1442.

You must return your request for participation postmarked no later than June 16, 1999, to:

Chuck Fejfar South Dakots Network 2900 West 10th St. Sioux Falls, SD 57104

A carbon copy of this request should be sent to:

Janice Volek	Phone # 605-852-2924
Venture Communications, Inc.	FAX # 605-852-2404
PO Box 476	
Highmore, SD 57345	i

7

Sincerely,

VENTURE COMMUNICATIONS, INC.

Randy Houdek General Managar

oc: Bill Fullard, South Dakota Public Utilities Commission

'JUN. 17. 1999 1:58PH SBTC/VCI 16858522484

i

TOWN	NPA	NXX
North Britton	701	443
Britton	605	448
Bowdle	605	285
Gettysburg	605	765
Lebanon	605	768
Onida	605	258
Pierpont	605	325
Roscoe	605	287
Rostyn	605	486
Selby	605	649
Wessington Springs	605	539

8

Venture Communications, Inc. exchanges to provide IntraLATA equal access:

1 -

1

ž

APPENDIX B

INTRALATA PIC LIST PARTICIPATION FORM FOR VENTURE COMMUNICATIONS, INC.

CARRIER NAME		
ACNA	1	
CIC		
BILLING ADDRESS		
BILLING CONTACT		
PHONE NUMBER		
FAX NUMBER	<u> </u>	
E-MAIL ADDRESS		
CUSTOMER SERVICE NUMBER (BUSINESS)		
CUSTOMER SERVICE NUMBER (RESIDENCE)		
WOULD YOU LIKE TO BE INCLUDED ON THE INTRALATA PIC LIST?	YES	
SIGNATURE		
TITLE		
DATE		

Please respond by June 16, 1999.

To: Chack Fejfar South Dalcota Network 2900 West 10th St. Sioux Falls, SD 57104 FAX # 605-334-4782 Cerbon Copy to: Janice Volck Venture Communications, Inc. PO Box 476 Highmore, SD 57345 FAX # 605-852-2404 APPENDEX C

9

4

. N. 17. 1999 1:51PM SBTC/VCI 16058522484

Date:

To: All Customers of Venture Communications, Inc.

Venture Communications, Inc. is pleased to announce that effective July 22, 1999, we will make it possible for you to choose from various long distance companies for your in state 1+ long distance service (intraLATA long distance service). This service includes all of your intrastate long distance calls made by dialing 1 plus the area code and local tele, ione number. With these changes, you will have the ability to select a long distance company for your in-state1+ long distance service.

In conjunction with making these changes, Venture Communications, Inc. is asking all of its local exchange subscribers to choose whether they wish to retain the current long distance company providing their intraLATA 1+ long distance service or wish to select another company for such service.

Currently Sully Buttes Long Distance provides you with 1+ long distance service. This company will continue to provide service to you unless you tall us to make a change and select another carrier. If you do nothing, your in-state 1+ long distance service will remain with Sully Buttes Long. Distance.

Attached is a list of long distance companies, in addition to Sully Buttes Long Distance, that have agreed to provide 1+ in-state long distance service in your area. If you wish to change your 1+ instate (instaLATA) long distance carrier, you must directly contact the long distance company that you've chosen in order to initiate that change.

You will not be charged for making a change to your existing in-state 1+ long distance aervice in response to this notice. In addition, for a period of 60 days after July 22, 1999, you may decide to change youn in-state 1+ long distance carrier, one time, at no charge. After September 20, 1999, you will incur a Primary Interexchange Carrier (PIC) charge of \$5.00 for changing carriers.

Castomers who wish to be placed on a specific calling plan with their selected long distance company must contact the long distance carrier to set up the plan.

Should you have any questions on this matter, please call our office at 800-824-7282 or simply dial 811.

Sincerely,

VENTURE COMMUNICATIONS, INC.

Randy Houdek General Manager

в

JUN. 17. 1999 1:52PM SBTC/VCI 1

SBTC/VCI 16058522404

1

1

LIST

Listed below are the Long Distance companies that are willing to offer you IntraLATA 1+ (generally in-state) long distance zervices. If you wish to change your intraLATA 1+ long distance carrier, please directly contact the long distance company that you've chosen in order to initiate that change.

ABC Telephone Company, Inc. (0023) Bus/Res: 1-800-555-1234

LMNOP Telecommunications (0288) Bus, 1-800-555-2345

ZXC Telephone Company (0333) Bus/Res: 1-800-555-3456

Sully Buttes Long Distance (0865) Bus/Res: 1-800-824-7282 (Current carrier - No action necessary if this is your carrier of choice)

Please respond on or before July 12, 1999.



June 17, 1999

West River Telecommunications Cooperative

and subsidiary companies West River Communications, Inc. Mobridge Telecommunications Co.

RECEIVED

JUN 2 1 1999

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

Elec reid on 6/17/99

RE: Docket TC99-030 (Implementation Plan for IntraLATA Dialing Parity)

Dear Mr. Bullard:

State Capitol Building

500 East Capitol Avenue Pierre, South Dakota 57501

Enclosed for filing in the above referenced Docket is an original and 10 copies of the revised "Implementation Plan for Intralata Dialing Parity" of Mobridge Telecommunications Co.

The plan is being refiled due to the Commission's decision on June 15, 1999 which ordered certain changes to our original plan. Those changes have been incorporated in this filing.

This plan was also submitted via electronic mail on Thursday, June 17, 1999.

If Commission staff or the Commissioners desire any additional information, please contact us.

Sincerely,

Bornie Frances

Mr. Bill Bullard, Executive Director South Dakota Public Utilities Commission

Bonnie Krause Financial Manager

BK/co Enc.

West River Communications, Inc. 1-800-256-1736 West River Telecommunications 701-748-2211 1.800.749-7220 Mobridge Telecommunications Co. 1-800-256-1734



June 17, 1999

West River Telecommunications Cooperative

and subsidiary companies West River Communications, Inc. Mobridge Telecommunications Co.

RECEIVED

JUN 2 1 1999

Mr. Bill Bullard, Executive Director South Dakota Public Utilities Commission State Capitol Building 500 East Capitol Avenue Pierre, South Dakota 57501

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

Elec reidon 6/17/99

RE: Docket TC99-030 (Implementation Plan for IntraLATA Dialing Parity)

Dear Mr. Bullard:

Enclosed for filing in the above referenced Docket is an original and 10 copies of the revised "Implementation Plan for Intralata Dialing Parity" of Mobridge Telecommunications Co.

The plan is being refiled due to the Commission's decision on June 15, 1999 which ordered certain changes to our original plan. Those changes have been incorporated in this filing.

This plan was also submitted via electronic mail on Thursday, June 17, 1999.

If Commission staff or the Commissioners desire any additional information, please contact us.

Sincerely.

Borrie Frances

Bonnie Krause Financial Manager

BK/co Enc.

West River Communications, Inc. 1-800-256-1736 West River Telecommunications 701-748-2211 1-800-748-7220 Mobridge Telecommunications Co. 1-800-256-1734

PO Box 467 - Hazen - North Dakota - 58545

IMPLEMENTATION PLAN FOR INTRALATA TOLL DIALING PARITY

Mobridge Telecommunications Co. submits this Implementation Plan for IntraLATA Toll Dialing Parity (hereinafter referenced as "the Plan") pursuant to 47 C.F.R. § 51.213 and recent Orders of the South Dakota Public Utilities Commission (hereinafter referenced as the "Commission") which require this filing or or before April 22, 1999. The purpose of the Plan is to provide information to the Commission concerning how and when Mobridge Telecommunications Co. will convert to intraLATA toll dialing parity, or, as it is sometimes called, intraLATA equal access. The provisioning of such capa ility will permit customers to select which long distance carrier they want to handle their intraLATA 1+ calls.

1. Company name and address:

Mobridge Telecommunications Co. PO Box 467 Hazen, North Dakota 58545 701-748-2211 FAX 701-748-6800

2. Associated LATA:

Mobridge Telecommunications Co. is located in and for purposes of this Plan associates with LATA 640.

Description of offering.

Mobridge Telecommunications Co. will offer intraLATA toll dialing parity through the "full 2-PIC" presubscription software installed on a centralized basis at the access tandem switch of South Dakota Network, Inc. ("SDN"). The "full 2-PIC" method of presubscription allows a customer to presubscribe to one long distance carrier for all 1 + intraLATA toll calls and to presubscribe to the same or another long distance carrier for all 1 + interLATA toll calls. Directory Assistance calls reached by dialing 1+ the telephone number are included in this intraLATA presubscription process. Because the intraLATA toll dialing parity capability will be provisioned via SDN at 2900 West 10th, Sioux Falls, SD 57104, interconnection and access necessary for participation in the offering may be ordered by long distance carriers via SDN.

Included local exchange areas and conversion date.

IntraLATA toll dialing parity through SDN will be made available in the following local exchange areas beginning July 22, 1999:

605/845 Mobridge

Interexchange carrier "carrier" notification

All carriers certified in South Dakota to provide long distance services will be notified by June 1, 1999, of the conversion to intraLATA toll dialing parity (a sample copy of the carrier notification letter to be used is attached hereto as Appendix A). These carriers will be asked to respond by June 16, 1999, if they want to participate in the intra .ATA toll presubscription process (a sample copy of the form which carriers will complete to indicate their participation in the presubscription process is attached hereto as Appendix B). Carriers that choose to participate in the presubscription process, shall submit verified preferred carrier change orders to Mobridge Telecommunications Co. to effectuate requests by subscribers for their intral ATA toll service.

Mobridge Telecommunications Co. will make available preconversion customer name and address lists. These customer lists are available to assist participating carriers in their presubscription solicitation efforts. These lists may be provided subject to a reasonable, non-discriminatory fee, with delivery contingent upon the carrier meeting all requirements for participation in the intraLATA presubscription process.

Customer notification.

Α. Current customers.

Customers, including payphone service providers, will be notified of the conversion to intral ATA toll dialing parity by letter postmarked no later than June 25, 1999 In such letter, customers will be advised of their intraLATA choices. Customers will be given the option to remain with their existing intraLATA 1+ carrier, West River Long Distance, or to choose a different intraLATA carrier for their 1+ service. The letter will include a list indicating all carriers in addition to the existing 1+ carrier that have chosen to participate in the intraLATA toll presubscription process (a sample copy of the customer notification letter that will be used is attached hereto as Appendix C). The list of carriers will include a toll free telephone number for each carrier listed.

Customers will be advised that if they choose a carrier other than their existing intraLATA 1+ carrier, they must directly contact the long distance company that they've chosen in order to initiate that change. Those customers choosing to stay with their existing intraLATA 1+ carrier, will not have to take any action. Their intraLATA 1+ service will remain with their current provider. Based on letters of agency received directly from participating carriers, Mobridge Telecommunications Co., as of the date and time that intraLATA dialing parity is implemented, will execute all necessary carrier selection changes.

Customers will not be charged for making any change to their intraLATA 1+ carrier during the presubscription process. In addition, customers will be advised that they will be given 60 days after the intraLATA toll dialing

5.

parity implementation date to change their intraLATA 1+ carrier at no charge.

Any preferred carrier freeze obtained by customers previously on their interLATA 1+ service shall not be extended to prevent their participation in the intraLATA toll presubscription process. Any preferred carrier freeze on a customer's intraLATA 1+ service shall be specifically authorized by the customer.

In the event that no access service requests are received and no carriers other than West River Long Distance choose to participate in the intraLATA 1+ offering, Mobridge Telecommunications Co. shall still provide notice to its subscribers that i+ dialing parity for intraLATA toll calls is available.

B. New Customers

New customers to Mobridge Telecommunications Co's., local exchange service, commencing such service after July 22, 1999, will be asked to choose both an intraLATA and interLATA carrier. They will be informed that regulations require that they choose a carrier for their intraLATA 1+ service (for calls within this LATA) and also choose a carrier for their interLATA 1+ service (for calls going outside this LATA). Mobridge Telecommunications Co. will either inform or provide new customers a list of all carriers participating in intraLATA 1+ services and all carriers participating in interLATA 1+ services. Customer service representatives of Mobridge Telecommunications Co. will reference the names of all carriers in the customer's exchange area providing 1+ toll service. If the customer requests, the customer service representative will provide contact telephone numbers for the available carriers' names in random order.

Customers applying for service will be encouraged to make a carrier selection. New customers will make an affirmative selection before they will be assigned to any carrier for either their intraLATA 1+ or interLATA 1+ service. New customers will be advised that neither intraLATA 1+ dialed calls or interLATA 1+ dialed calls originated from the customer's local line will be possible until a carrier selection is made. Until a selection is made, non-selecting customers will need to dial a carrier access code to make either intraLATA or interLATA toll calls.

Mobridge Telecommunications Co. upon being contacted by either new or existing customers and receiving requests for a preferred carrier or preferred carrier change shall not market its own intraLATA 1+ service on that same call, but may answer customer initiated questions.

7. Request for approval of Plan

Mobridge Telecommunications Co. asks that the Commission grant its official approval of this Plan no earlier than June 22, 1999.

Dated this 17th day of June 1999.

Sincerely,

Robert A. Barfield

General Manager

Mobridge Telecommunications Co. IntraLATA Dialing Parity Timeline

Carrier notifications completed by: June 1, 1999

Carrier responses due by: June 16, 1999

Customer notification completed by: June 25, 1999

Due date for customer response forms: July 12, 1999

IntraLATA dialing parity implementation date: July 22, 1999

End of 60 day grace period: September 20, 1999



West River Telecommunications Cooperative

and subsidiary companies West River Communications, Inc. Mobridge Telecommunications Co

Date

TO: All Long Distance Carriers of Record in the State of South Dakota

Mobridge Telecommunications Co. (MTC) is pleased to announce the provisioning of intraLATA equal access in certain local exchange areas. A list of these exchanges is attached. This service will be made available to customers on July 22, 1999.

It is MTC's intent to work closely with all users of access and maintain an impartial position with regard to the end user's selection of an IntraLATA long distance carrier. MTC will supply a PIC list for the end user's selection of an IntraLATA long distance carrier. However, because intraLATA equal access will be provisioned via South Dakota Network (SDN) at 2900 West 10th Street, Sioux Falls, SD 57104, interconnection and access may be ordered via SDN.

Please complete and return the attached form if you wish to be a carrier of choice on the intraLATA equal access PIC list for the exchanges listed on the next page.

Questions may be directed to Blaine L. Lemer, Plant Manager at 701-748-2211.

You must return your request for participation postmarked no later than June 16, 1999, to:

Contact Name: LEC Name: Address: Blaine L. Lemer Mobridge Telecommunications Co. PO Box 467 Hazen, ND 58545 701-748-6800

Sincerely,

Blaine L. Lemer Plant Manager

BLL/co

cc: Bill Bullard, South Dakota Public Utilities Commission

West River Communications, Inc. 1-800-256-1736 West River Telecommunications 701-748-2211 1-800-748-7220 Mobridge Telecommunications Co. 1-800-256-1734

PO Box 467 - Hazen - North Dakota - 58545

Mobridge Telecommunications Co. exchanges to provide IntraLATA equal access:

NPA	NXX
605	845

APPENDIX B

INTRALATA PIC LIST PARTICIPATION FORM FOR MOBRIDGE TELECOMMUNICATIONS CO.

CARRIER NAME	
ACNA	
CIC	
BILLING ADDRESS	
BILLING CONTACT	
PHONE NUMBER	
FAX NUMBER	
E-MAIL ADDRESS	
CUSTOMER SERVICE NUMBER (BUSINESS)	
CUSTOMER SERVICE NUMBER (RESIDENCE)	
WOULD YOU LIKE TO BE INCLUDED ON THE INTRALATA PIC LIST?	YES NO
SIGNATURE	
TITLE	
DATE	

Please respond by June 16, 1999.

Address:	PO Box 467
Contact Name:	Blaine L. Lemer, Plant Manager
	Mobridge Telecommunications Co.
Address:	Hazen, ND 58545



West River Telecommunications Cooperative

and subsidiary companies West River Communications, Inc. Mobridge Telecommunications for c

Date

To: All Customers of Mobridge Telecommunications Co.

Mob. idge Telecommunications Co. is pleased to announce that effective July 22, 1999, we will make it possible for you to choose from various long distance companies for your in-state 1+ long distance service (intraLATA long distance service). This service includes all of your intrastate long distance calls made by dialing 1 plus the area code and local telephone number. With these changes, you will have the ability to select a long distance company for your in-state 1+ long distance service.

In conjunction with making these changes, Mobridge Telecommunications Co. is asking all of its local exchange subscribers to choose whether they wish to retain the current long distance company providing their in-state 1+ long distance service or select another company for the service.

Currently West River Long Distance provides your in-state 1+ long distance service. This company will continue to provide service to you unless you select another carrier. If you do nothing, your in-state 1+ long distance service will remain with West River Long Distance.

Attached is a list of long distance companies, in addition to West River Long Distance, that have agreed to provide 1+ in-state long distance services in your area. If you wish to change your 1+ in-state (intraLATA) long distance carrier, you must directly contact the long distance company that you've chosen in order to initiate that change.

You will not be charged for making a change to your existing in-state 1+ long distance service in response to this notice. In addition, for a period of 60 days after July 22, 1999, you may decide to change your in-state 1+ long distance carrier, one time, at no charge. After September 20, 1999, you will incur a Primary Interexchange Carrier (I'IC) charge of \$5.00 for changing carriers.

Please call our office at 1-800-748-7220 if you have any questions on this matter.

Sincerely,

Robert A. Barfield General Manager

RAB/co

West River Communications, Inc. 1-800-256-1736

West River Telecommunications 701-748-2211 1-800-748-7220 Mobridge Telecommunications Co. 1-800-256-1734

PO Box 467 - Hazen - North D. kota - 58545

Listed below are the other Long Distance companies that are willing to offer you IntraLATA 1+ (generally in-state) long distance services. If you wish to change your intraLATA 1+ long distance carrier, please directly contact the long distance company that you've chosen in order to initiate that change.

ABC Telephone Company, Inc. Bus/Res: 1-800-555-1234

LMNOP Telecommunications Bus: 1-800-555-2345

ZXC Telephone Company Bus/Res: 1-800-555-3456

Please respond on or before July 12, 1999.

LIST



June 17, 1999

West River Telecommunications Cooperative

and subsidiary companies West River Communications, Inc. Mobridge Telecommunications Co.

RECEIVED

Mr. Bill Bullard, Executive Director South Dakota Public Utilities Commission State Capitol Building 500 East Capitol Avenue Pierre, South Dakota 57501 JUN 21 1999 SOUTH DAKOTA PUBLIC UTILITIES COMMISSION Elec. rect on 6/17/99

RE: Docket TC99-030 (Implementation Plan for IntraLATA Dialing Parity)

Des. Mr. Bullard:

Enclosed for filing in the above referenced Docket is an original and 10 copies of the revised "Implementation Plan for Intralata Dialing Parity of West River Telecommunications Cooperative.

The plan is being refiled due to the Commission's decision on June 15, 1999 which ordered certain changes to our original plan. Those changes have been incorporated in this filing.

This plan was also submitted via electronic mail on Thursday, June 17, 1999.

If Commission staff or the Commissioners desire any additional information, please contact us.

Sincerely,

mice Grause Les

Bonnie Krause Financial Manager

BK/co Enc.

West River Communications, Inc. 1-800-256-1736 West River Telecommunications 701-748-2211 1-800-748-7220

Mobridge Telecommunications Co. 1-800-256-1734

PO Box 467 - Hazen - North Dakota - 58545

IMPLEMENTATION PLAN FOR INTRALATA TOLL DIALING PARITY

West River Telecommunications Cooperative submits this Implementation Plan for IntraLATA Toll Dialing Parity (hereinafter referenced as "the Plan") pursant to 47 C.F.R. § 51.213 and recent Orders of the South Dakota Public Utilities Commission (hereinafter referenced as the "Commission") which require this filing or or before April 22, 1999. The purpose of the Plan is to provide information to the Commission concerning how and when West River Telecommunications Cooperative will convert to intraLATA toll dialing parity, or, as it is sometimes called, intraLATA equal access. The provisioning of such capability will permit customers to select which long distance carrier they want to handle their intraLATA 1+ calls.

1. Company name and address:

West River Telecommunications Cooperative PO Box 467 Hazen, North Dakota 58545 701-748-2211 FAX 701-748-6800

Associated LATA:

West River Telecommunications Cooperative is located in and for purposes of this Plan associates with LATA 640.

Description of offering.

West River Telecommunications Cooperative will offer intraLATA toll dialing parity through the deployment of "full 2-PIC" presubscription software at each end office location. The "full 2-PIC" method of presubscription allows a customer to presubscribe to one long distance carrier for all 1+ intraLATA toll calls and to presubscribe to the same or another long distance carrier for all 1+ interLATA toll calls. Directory Assistance calls reached by dialing 1+ the telephone number are included in this intraLATA presubscription process. Interconnection and/or access necessary for participation in the offering may be ordered by long distance carriers directly from West River Telecommunications Cooperative.

4. Included local exchange areas and conversion date,

IntraLATA toll dialing parity through these software upgrades will be made available in the following local exchange areas beginning July 22, 1999:

605/823 McLaughlin 701/827 North McLaughlin

Interexchange carrier "carrier" notification

All carriers certified in South Dakota to provide long distance services will be notified by June 1, 1999, of the conversion to intraLATA toll dialing parity (a sample copy of the carrier notification letter to be used is attached hereto as Appendix A). These carriers will be asked to respond by June 16, 1999, if they want to participate in the intraLATA toll presubscription process (a sample copy of the form which carriers will complete to indicate their participation in the presubscription process is attached hereto as Appendix B). Carriers that choose to participate in the presubscription process, shall submit verified preferred carrier change orders to West River Telecommunications Cooperative to effectuate requests by subscribers for their intraLATA toll service.

West River Telecommunications Cooperative will make available preconversion customer name and address lists. These customer lists are available to assist participating carriers in their presubscription solicitation efforts. These lists may be provided subject to a reasonable, non-discriminatory fee, with delivery contingent upon the carrier meeting all requirements for participation in the intraLATA presubscription process.

Customer notification.

A. Current customers.

Customers, including payphone service providers, will be notified of the conversion to intraLATA toll dialing parity by letter postmarked no later than June 25, 1999. In such letter, customers will be advised of their intraLATA choices. Customers will be given the option to remain with their existing intraLATA 1+ carrier, West River Long Distance, or to choose a different intraLATA carrier for their 1+ service. The letter will include a list indicating all carriers in addition to the existing 1+ carrier that have chosen to participate in the intraLATA toll presubscription process (a sample copy of the customer notification letter that will be used is attached hereto as Appendix C). The list of carriers will include a toll free telephone number for each carrier listed.

Customers will be advised that if they choose a carrier other than their existing intraLATA 1+ carrier, they must directly contact the long distance company that they've chosen in order to initiate that change. Those customers choosing to stay with their existing intraLATA 1+ carrier, will not have to take any action. Their intraLATA 1+ service will remain with their current provider. Based on letters of agency received directly from participating carriers, West River Telecommunications Cooperative, as of the date and time that intraLATA dialing parity is implemented, will execute all necessary carrier selection changes.

Customers will not be charged for making any change to their intraLATA 1+ carrier during the presubscription process. In addition, customers will be advised that they will be given 60 days after the intraLATA toll dialing parity implementation date to change their intraLATA 1+ carrier =t no charge.

Any preferred carrier freeze obtained by customers previously on their interLATA 1+ service shall not be extended to prevent their participation in the intraLATA toll presubscription process. Any preferred carrier freeze on a customer's intraLATA 1+ service shall be specifically authorized by the customer.

In the event that no access service requests are received and no carriers other than West River Long Distance choose to participate in the intraLATA 1+ offering, West River Telecommunications Cooperative shall still provide notice to its subscribers that 1+ dialing parity for intraLATA toll calls is available.

B. New Customers

New customers to West River Telecommunications Cooperative's, local exchange service, commencing such service after July 22, 1999, will be asked to choose both an intraLATA and interLATA carrier. They will be informed that regulations require that they choose a carrier for their intraLATA 1+ service (for calls within this LATA) and also choose a carrier for their interLATA 1+ service (for calls going outside this LATA). West River Telecommunications Cooperative will either inform or provide new customers a list of all carriers participating in intraLATA 1+ services and all carriers participating in interLATA 1+ services. Customer service representatives of West River Telecommunications Cooperative will reference the names of all carriers in the customer's exchange area providing 1+ toll service. If the customer requests, the customer service representative will provide contact telephone numbers for the available carriers. Lists used by the customer service representative will contain carriers' names in random order.

Customers applying for service will be encouraged to make a carrier selection. New customers will make an affirmative selection before they will be assigned to any carrier for either their intraLATA 1+ or interLATA 1+ service. New customers will be advised that neither intraLATA 1+ dialed calls or interLATA 1+ dialed calls originated from the customer's local line will be possible until a carrier selection is made. Until a selection is made, non-selecting customers will need to dial a carrier access code to make either intraLATA or interLATA toll calls.

West River Telecommunications Cooperative upon being contacted by either new or existing customers and receiving requests for a preferred carrier or preferred carrier change, shall not market its own intraLATA 1+ service on that same call, but may answer customer initiated questions. 7. Request for approval of Plan

West River Telecommunications Cooperative asks that the Commission grant its official approval of this Plan no earlier than June 22, 1999.

Dated this 17th day of June, 1999

Sincerely,

OLIVON DAY AGINO

Robert a. Barfield 20 Robert . . Barfield

General Manager

West River Telecommunications Cooperative IntraLATA Dialing Parity Timeline

Carrier notifications completed by: June 1, 1999

Carrier responses due by: June 16, 1999

Customer notification completed by: June 25, 1999

Due date for customer response forms: July 12, 1999

IntraLATA dialing parity implementation date: July 22, 1999

End of 60 day grace period: September 28, 1999



West River Telecommunications Cooperative

and subsidiary companies West River Communications, Inc. Mobridge Telecommunications Co. APPENDIX A

Date

TO: All Long Distance Carriers of Record in the State of South Dakota

West K.ver Telecommunications Cooperative (WRTC) is pleased to announce the provisioning of intraLATA equal access in certain local exchange areas. A list of these exchanges is attached. This service will be made available to customers on July 22, 1999.

It is WRTC's intent to work closely with all users of access and maintain an impartial position with regard to the end user's selection of an IntraLATA long distance carrier. WRTC will supply a PIC list for the end user's selection of an IntraLATA long distance carrier. IntraLATA equal access will be provisioned on an end office basis and therefore interconnection and access may be ordered through West River Telecommunications Cooperative.

Please complete and return the attached form if you wish to be a carrier of choice on the IntraLATA equal access PIC list for the exchanges listed on the next page.

Questions may be directed to Blaine L. Lemer, Plant Manager at 701-748-2211.

You must return your request for participation postmarked no later than June 16, 1999, to:

Contact Name: LEC Name: Address:

FAX #

Blaine L. Lemer West River Telecommunications Cooperative PO Box 467 Hazen, ND 58545 701-748-6800

Sincerely,

Blaine L. Lemer Plant Manager

BLL/co

ce: Bill Bullard, South Dakota Public Utilities Commission

West River Communications, Inc. 1-800-256-1736 West River Telecommunications 701-748-2211 1-800-748-7220 Mobridge Telecommunications Co. 1-800-256-1734

PO Box 467 - Hazen - North Dakota - 58545

West	River T	elecomm	unications	Ceop	rative	exchanges
	top	provide I	straLATA	equal	access:	

TOWN	NPA	NXX
McLaughlin	605	823
McLaughlin	701	827

APPENDIX B

INTRALATA PIC LIST PARTICIPATION FORM FOR WEST RIVER TELECOMMUNICATIONS COOPERATIVE

CARRIER NAME	
ACNA	
CIC	
BILLING ADDRESS	
BILLING CONTACT	
PHONL NUMBER	
FAX NUMBER	
E-MAIL ADDRESS	
CUSTOMER SERVICE NUMBER (BUSINESS)	
CUSTOMER SERVICE NUMBER (RESIDENCE)	
WOULD YOU LIKE TO BE INCLUDED ON THE INTRALATA PIC LIST?	YES NO
SIGNATURE	
TITLE	
DATE	

Please respond by June 16, 1999.

Address: PO Box 467 Contact Name: Blaine L. Lemer, Plant Manager West River Telecommunications Cooperative Address: Hazen, ND 58545



West River Telecommunications Cooperative

and subsidiary companies West River Communications, Inc. Mobridge Telecommunications Gas company

Date

To: All Customers of West River Telecommunications Cooperative

West River Telecommunications Cooperative is pleased to announce that effective July 22, 1999, we will make it possible for you to choose from various long distance companies for your in-state 1+ long distance service (intraLATA long distance service). This service includes all of your intrastate long distance calls made by dialing 1 plus the area code and local telephone number. With these changes, you will have the ability to select a long distance company for your in-state 1+ long distance service.

In conjunction with making these changes, West River Telecommunications Cooperative is asking all of its local exchange subscribers to choose whether they wish to retain the current long distance company providing their in-state 1+ long distance service or select another company for the service.

Currently West River Long Distance provides your in-state 1+ long distance service. This company will continue to provide service to you unless you select another carrier. If you do nothing, your in-state 1+ long distance service will remain with West River Long Distance.

Attached is a list of long distance companies, in addition to West River Long Distance, that have agreed to provide 1+ in-state long distance services in your area. If you wish to change your 1+ in state (intraLATA) long distance carrier, you must directly contact the long distance company that you've chosen in order to initiate that change.

You will not be charged for making a change to your existing in-state 1+ long distance service in response to this notice. In addition, for a period of 60 days after July 22, 1999, you may decide to change your in-state 1+ long distance carrier, one time, at no charge. After September 20, 1999, you will incur a Primary Interexchange Carrier (PIC) charge of \$5.00 for changing carriers.

Please call our office at 1-800-748-7220 if you have any questions on this matter.

Sincerely,

Robert A. Barfield General Manager

RAB/co

West River Communications, Inc. 1-800-256-1736 West River Telecommunications 701-748-2211 1-800-748-7220 Mobridge Telecommunications Co. 1-800-256-1734

PO Box 467 - Hazen - North Dakota - 58545

Listed below are the other Long Distance companies that are willing to offer you IntraLATA 1+ (generally in-state) long distance services. If you wish to change your intraLATA 1+ long distance carrier, please directly contact the long distance company that you've chosen in order to initiate that change.

ABC Telephone Company, Inc. Bus/Res: 1-800-555-1234

LMNOP Telecommunications Bus: 1-800-555-2345

ZXC Telephone Company Bus/Res: 1-800-555-3456

Please respond on or before July 12, 1999.

LIST



RECEIVED

JUN 1 8 1999

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

June 17, 1999

Bill Bullard, Executive Director South Dakota Public Utilities Commission State Capitol Building 500 East Capitol Ave. Pierre, SD 57501

FAX Received JUN 17 1999

RE: Docket TC99-030 (Revised Implementation Plan for IntraLATA Dialing Parity)

Dear Bill:

Enclosed for filing is VCI's revised version of our "Implementation Plan for IntraLATA Toll Dialing Parity."

We hope this will meet your requirements and look forward to hearing from you in the near future. Should you have any questions, please feel free to call upon us.

Sincerely,

VENTURE COMMUNICATIONS, INC.

andy Houdek by ge Randy Houdek

General Manager

10

IMPLEMENTATION PLAN FOR INTRALATA TOLL DIALING PARITY

Venture Communications, Inc. submits this Implementation Plan for IntraLATA Toll Dialing Parity (hereinafter referenced as "the Plan") pursuant to 47 C.F.R. § 51.213 and recent Orders of the South Dakota Public Utilities Commission (hereinafter referenced as the "Commission") which require this filing on or before April 22, 1999. The purpose of the Plan is to provide information to the Commission concerning how and when Venture Communications, Inc. will convert to intraLATA toll dialing parity, or, as it is sometimes called, intraLATA equal access. The provisioning of such capability will permit customers to select which long distance carrier they want to handle their intraLATA 1+ calls.

. Company name and address:

Venture Communications Inc. 218 Commercial SE PO Box 157 Highmore, SD 57345 Phone number: 605-852-2224 Fax Number: 605-852-2404

2. Associated LATA:

Venture Communications, Inc. is located in and for purposes of this Plan associates with LATA 640.

3. Description of offering.

Venture Communications, Inc. will offer intraLATA toll dialing parity through the "full 2-PIC" presubscription software installed on a centralized basis at the access tandem switch of South Dakota Network, Inc. ("SDN"). The "full 2-PIC" method of presubscription allows a customer to presubscribe to one long distance carrier for all 1+ intraLATA toll calls and to presubscribe to same or another long distance carrier for all 1+ interLATA toll calls. Directory assistance calls reached by dialing 1+ the telephone number are included in this intraLATA presubscription process. Because the intraLATA toll dialing parity capability will be provisioned via SDN at 2900 West 10th, Sioux Falls, SD 57104, interconnection and access necessary for participation in the offering may be ordered by long distance carriers via SDN.

4. Included local exchange areas and conversion date.

IntraLATA toll dialing parity through SDN will be made available in the following local exchange areas beginning July 22, 1999:

North Britton	701-443	Pierpont	605-325
Britton	605-448	Roscoe	605-287
Bowdle	605-285	Roslyn	605-486
Gettysburg	605-765	Selby	605-649
Lebanon	605-768	Wess. Sprin	igs 605-539
Onida	605-258		

5. Interexchange carrier "carrier" notification.

All carriers certified in South Dakota to provide long distance services will be notified by June 1, 1999, of the conversion to intraLATA toll dialing parity (a sample copy of the carrier notification letter to be used is attached hereto as Appendix A). These carriers will be asked to respond by June 16, 1999, if they want to participate in the intraLATA toll presubscription process (a sample copy of the form which carriers will complete to indicate their participation in the presubscription process is attached hereto as Appendix B). Carriers that choose to participate in the presubscription process, shall submit verified preferred carrier change orders to Venture Communications, Inc. to effectuate requests by subscribers for their intraLATA toll service.

Venture Communications, Inc. will make available pre-conversion customer name and address lists upon the request of the long distance carrier. These customer lists are available to assist participating carriers in their presubscription solicitation efforts. These lists may be provided subject to a reasonable, discriminatory fee, with delivery contingent upon the carrier meeting all requirements for participation in the intraLATA presubscription process.

6. Customer notification.

A. Current customers.

Customers, including payphone service providers, will be notified of the conversion to intraLATA toll dialing parity by letter postmarked no later than June 25, 1999. In such letter, customers will be advised of their intraLATA choices, Customers will be given the option to remain with their existing intraLATA 1+ carrier, Sully Buttes Long Distance, or to choose a different intraLATA carrier for their 1+ service. The letter will include a list indicating all carriers in addition to the existing 1+ carrier that have chosen to participate in the intraLATA toll presubscription process (a sample copy of the customer notification letter that will be used is attached hereto as Appendix C). The list of carriers will include a toll free telephone number for each carrier listed.

Customers will be advised that if they choose a carrier other than their existing intraLATA 1+ carrier, they must directly contact the long distance company they have chosen in order to initiate that change. Those customers choosing to stay with their existing intraLATA 1+ carrier, will not have to take any action. Their intraLATA 1+ service will remain with their current provider. Based on letters of agency received directly from participating carriers, Venture Communications, Inc., as of the date and time that intraLATA dialing parity is implemented, will execute all necessary carrier selection changes.

Customers will not be charged for making any change to their intraLATA 1+ carrier during the presubscription process. In addition, customers will be advised that they will be given 60 days after the intraLATA toll dialing parity implementation date to change their intraLATA 1+ carrier at no charge. Any preferred carrier freeze obtained by the customers previously on their interLATA 1+ service shall not be extended to prevent their participation in the intraLATA toll presubscription process. Any preferred carrier freeze on customer's intraLATA 1+ service shall be specifically authorized by the customer.

In the event that no access service requests are received and no carriers other than Sully Buttes Long Distance choose to participate in the intraLATA 1+ offering, Venture Communications, Inc. shall still provide notice to its subscribers that 1+ dialing parity for intraLATA toll calls is available.

B. New customers.

New customers to Venture Communications, Inc.'s local exchange service, commencing such service after June 25, 1999, will be asked to choose both an intraLATA and interLATA carrier. They will be informed that regulations require that they choose a carrier for their intraLATA 1+ service (for calls within this LATA) and also choose a carrier for their interLATA 1+ service (for calls going outside this LATA). Venture Communications, Inc. will either inform or provide new customers a list of all carriers participating in intraLATA 1+ services and all carriers participating in interLATA 1+ services. Customer service representatives of Venture Communications, Inc. will reference the names of all carriers in the customer's exchange area providing 1+ toll service. If the customer requests, the customer service representative will provide contact telephone numbers for the available carriers. Lists used by the customer service representatives will contain carriers' names in random order.

Customers applying for service will be encouraged to make a carrier selection. New customers will make an affirmative selection before they will be assigned to any carrier for either their intraLATA 1+ or interLATA 1+ service. New customers will be advised that neither intraLATA 1+ dialed calls or interLATA 1+ dialed calls originated from the customer's local line will be possible until a carrier selection is made.

Venture Communications, Inc. upon being contacted by either new or existing customers and receiving requests for a preferred carrier or preferred carrier change shall not market its own intraLATA 1+ service on that same call, but may answer customer initiated questions.

7. Request for approval of Plan.

Venture Communications, Inc. asks that the Commission grant its official approval of this Plan no earlier than June 22, 1999.

Dated this 17th day of June, 1999.

Respectfully submitted,

Randy W. Houdek Manager, Venture Communications, Inc.

3

Venture Communications, Inc. IntraLATA Dialing Parity Timeline

4

Carrier notifications completed by: June 1, 1999

Carrier responses due by: June 16, 1999

Customer notification completed by: June 25, 1999

Due date for customer response forms: July 12, 1999

IntraLATA dialing parity implementation date: July 22, 1999

End of 60 day grace period: September 20, 1999

C

APPENDIX A

Date

TO: All Long Distance Carriers of Record in the State of South Dakota

Venture Communications, Inc. is pleased to announce the provisioning of IntraLATA equal access in certain local exchange areas. A list of these exchanges is attached. This service will be made available to customers on July 22, 1999.

It is Ven ure Communications, Inc.'s intent to work closely with all users of access and maintain an impartial position with regard to the end user's selection of an IntraLATA long distance carrier. Venture Communications will supply a PIC list for the end user's selection of an IntraLATA long distance carrier. However, because IntraLATA equal access will be provisioned via South Dakota Network (SDN) at 2900 West 10th Street, Sioux Falls, SD 57104, interconnection and access service requests may be ordered via SDN.

Please complete and return the attached form if you wish to be a carrier of choice on the IntraLATA equal access PIC list for the exchanges listed on the next page.

Questions may be directed to Chuck Fejfar at 800-247-1442.

You must return your request for participation postmarked no later than June 16, 1999, to:

Chuck Fejfar South Dakota Network 2900 West 10th St. Sioux Falls, SD 57104 FAX # 605-334-4782

A carbon copy of this request should be sent to:

Janice Volek Phone # 605-852-2224 Venture Communications, Inc. FAX # 605-852-2404 PO Box 476 Highmore, SD 57345

Sincerely,

VENTURE COMMUNICATIONS, INC.

Randy Houdek General Manager

cc: Bill Bullard, South Dakota Public Utilities Commission

Venture Communications, Inc. exchanges to provide IntraLATA equal access:

TOWN	NPA	NXX
North Britton	701	443
Britton	605	448
Bowdle	605	285
Gettysburg	605	765
Lebanon	605	768
Onida	605	258
Pierpont	605	325
Roscoe	605	287
Roslyn	605	486
Selby	605	649
Wessington Springs	605	539

APPENDIX B

INTRALATA PIC LIST PARTICIPATION FORM FOR VENTURE COMMUNICATIONS, INC.

CARRIER NAME	
ACNA	
CIC	
BILLING ADDRESS	
BILLING CONTACT	
PHONE NUMBER	
r'AX NUMBER	
E-MAIL ADDRESS	
CUSTOMER SERVICE NUMBER (BUSINESS)	
CUSTOMER SERVICE NUMBER (RESIDENCE)	
WOULD YOU LIKE TO BE INCLUDED ON THE INTRALATA PIC LIST?	YES NO
SIGNATURE	
TITLE	
DATE	

Please respond by June 16, 1999.

To: Chuck Fejfar South Dakota Network 2900 West 10th St. Sioux Falls, SD 57104 FAX # 605-334-4782 Carbon Copy to: Janice Volek Venture Communications, Inc. PO Box 476 Highmore, SD 57345 FAX # 605-852-2404 APPENDIX C Date:

To: All Customers of Venture Communications, Inc.

Venture Communications, Inc. is pleased to announce that effective July 22, 1999. we will make it possible for you to choose from various long distance companies for your in-state 1+ long distance service (intraLATA long distance service). This service includes all of your intrastate long distance calls made by dialing 1 plus the area code and local telephone number. With these changes, you will have the ability to select a lorg distance company for your in-state 1+ long distance service.

In conjunction with making these changes, Venture Communications, Inc. is asking all of its local exchange subscribers to choose whether they wish to retain the current long distance company providing their intraLATA 1+ long distance service or wish to select another company for such service.

Currently Sully Buttes Long Distance provides you with 1+ long distance service. This company will continue to provide service to you unless you tell us to make a change and select another earrier. If you do nothing, your in-state1+ long distance service will remain with Sully Buttes Long Distance.

Attached is a list of long distance companies, in addition to Sully Buttes Long Distance, that have agreed to provide 1+ in-state long distance service in your area. If you wish to change your 1+ in-state (intraLATA) long distance carrier, you must directly contact the long distance company that you've chosen in order to initiate that change.

You will not be charged for making a change to your existing in-state 1+ long distance service in response to this notice. In addition, for a period of 60 days after July 22, 1999, you may decide to change your in-state 1+ long distance carrier, one time, at no charge. After September 20, 1999, you will incur a Primary Interexchange Carrier (PIC) charge of \$5.00 for changing carriers.

Customers who wish to be placed on a specific calling plan with their selected long distance company must contact the long distance carrier to set up the plan.

Should you have any questions on this matter, please call our office at 800-824-7282 or simply dial 811.

Sincerely,

VENTURE COMMUNICATIONS, INC.

Randy Houdek General Manager

LIST

Listed below are the Long Distance companies that are willing to offer you IntraLATA 1+ (generally in-state) long distance services. If you wish to change your intraLATA 1+ long distance carrier, please directly contact the long distance company that you've chosen in order to initiate that change.

ABC Tr'ephone Company, Inc. (0023) Bus/Res: 1-800-555-1234

LMNOP Telecommunications (0288) Bus: 1-800-555-2345

ZXC Telephone Company (0333) Bus/Res: 1-800-555-3456

Sully Buttes Long Distance (0865) Bus/Res: 1-800-824-7282 (Current carrier – No action necessary if this is your carrier of choice)

Please respond on or before July 12, 1999.



Heartland Communications, Inc.

120 E. FIRST • P.O. BOX 48 • KIMBALL, SD 57355-0048 • PHONE (605) 778-6221 • FAX (605) 778-8080

June 16, 1999

RECEIVED

Bill Bullard, Executive Director South Dakota Public Utilities Commission State Capitol Building 500 East Capitol Ave. Pierre, South Dakota 57501

JUN 1 8 1999

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

RE: Docket TC99-030 (Implementation Plan for IntraLATA Dialing Parity)

Dear Bill:

Enclosed for filing in the above referenced Docket is the final version for the "Implementation Plan for IntraLATA Toll Dialing Parity" of Heartland Communications, Inc.

If Commission Staff or the Commissioners desire any additional information to supplement this filing, please advise.

Thank you for your assistance in filing and distributing these documents.

Sincerely.

. /1

Marl D. Benton, Manager

RECEIVED

JUN 1 8 1999

IMPLEMENTATION PLAN FOR INTRALATA TOLL DIALING PARITY

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

Heartland Communications, Inc. submits this Implementation Plan for IntraLATA Toll Dialing Parity (hereinafter referenced as "the Plan") pursuant to 47 C.F.R. § 51.213 and recent Orders of the South Dakota Public Utilities Commission (hereinafter referenced as the "Commission") which require this filing on or before April 22, 1999. The purpose of the Plan is to provide information to the Commission concerning how and when Heartland Communications, Inc. will convert to intraLATA toll dialing parity, or, as it is sometimes called, intraLATA equal access. The provisioning of such capability will permit customers to select which long distance carrier they want to handle their intraLATA 1+ calls.

1. Company name and address:

Heartland Communications, Inc. P.O. Box 48, Kimball, SD 57355 Voice : 605.778.6221 Fax : 605.778.8080

2. Associated LATA:

Heartland Communications, Inc. is located in and for purposes of this Plan associates with LATA 640.

3. Description of offering.

Heartland Communications, Inc. will offer intraLATA toll dialing parity through the "full 2-PIC" presubscription software installed on a centralized basis at the access tandem switch of South Dakota Network, Inc. ("SDN"). The "full 2-PIC" method of presubscription allows a customer to presubscribe to one long distance carrier for all 1+ intraLATA toll calls and to presubscribe to the same or another long distance carrier for all 1+ interLATA toll calls. Directory assistance calls reached by dialing 1+ the telephone number are included in this intraLATA presubscription process, Because the intraLATA toll dialing parity capability will be provisioned via SDN at 2900 West 10th, Sioux Falls, SD 57104, interconnection and access necessary for participation in the offering may be ordered by long distance carriers via SDN.

4. Included local exchange areas and conversion date.

IntraLATA toll dialing parity through SDN will be made available in the following local exchange areas beginning July 22, 1999:

PLATTE 605-337

5. Interexchange carrier "carrier" notification.

All carriers certified in South Dakota to provide long distance services will be notified by June 1, 1999, of the conversion to intraLATA toll dialing parity (a sample copy of the carrier notification letter to be used is attached hereto as Appendix A). These carriers will be asked to respond by June 16, 1999, if they want to participate in the intraLATA toll presubscription process (a sample copy of the form which carriers will complete to indicate their participation in the presubscription process is attached hereto as Appendix B). Carriers that choose to participate in the presubscription process, shall submit verified preferred carrier change orders to Heartland Communications, Inc. to effectuate requests by subscribers for their intraLATA toll.

Heartland Communications, Inc. will make available preconversion customer name and address lists. These customer lists are available to assist participating carriers in their presubscription solicitation efforts. These lists may be provided subject to a reasonable non-discriminatory fee, with delivery contingent upon the carrier meeting all requirements for participation in the intraLATA presubscription process.

6. Customer notification.

0154 .30 .544

A. Current customers.

Customers, including payphone service providers, will be notified of the conversion to intraLATA toll dialing parity by letter postmarked no later than June 25, 1999. In such letter, customers will be advised of their intraLATA choices. Customers will be given the option to remain with their existing intraLATA 1+ carrier, Heartland Long Distance, or to choose a different intraLATA carrier for their 1+ service. The letter will include a list indicating all carriers in addition to the existing 1+ carrier that have chosen to participate in the intraLATA toll presubscription process (a sample copy of the customer notification letter that will be used is attached hereto as Appendix C). The list of carriers will include a toll free telephone number for each carrier listed.

Customers will be advised that if they choose a carrier other than their existing intraLATA 1+ carrier, they must directly contact the long distance company that they've chosen in order to initiate that change. Those customers choosing to stay with their existing intraLATA 1+ carrier will not have to take any action. Their intraLATA 1+ service will remain with their current provider. Based on letters of agency received directly from participating carriers, Heartland Communications, Inc., as of the date and time that intraLATA dialing parity is implemented, will execute all necessary carrier selection changes.

Customers will not be charged for making any change to their intraLATA 1+ carrier during the presubscription process. In addition, customers will be advised that they will be given 60 days after the intraLATA toll dialing parity implementation date to change their intraLATA 1+ carrier at no charge. Any preferred carrier freeze obtained by customers previously on their interLATA 1+ service shall not be extended to prevent their participation in the intraLATA toll presubscription process. Any preferred carrier freeze on a customer's intraLATA 1+ service shall be specifically authorized by the customer.

In the event that no access service requests are received and no carriers other than Heartland Long Distance choose to participate in the intraLATA 1+ offering, Heartland Communications, Inc. shall still provide notice to its subscribers that 1+ dialing parity for intraLATA toll calls is available.

B. New customers.

New customers to Heartland Communications, Inc. local exchange service, commencing such service after June 25, 1999, will be asked to choose both an intraLATA and interLATA carrier. They will be informed that regulations require that they choose a carrier for their intraLATA 1+ service (for calls within this LATA) and also choose a carrier for their interLATA 1+ service (for calls going outside this LATA). Heartland Communications, Inc. will either inform or provide new customers a list of all carriers participating in intraLATA 1+ services and all carriers participating in interLATA 1+ services. Customer service representatives of Heartland Communications, Inc. will reference the names of all carriers in the customer's exchange area providing 1+ toll service in the customer's exchange area. If the customer requests, the customer service representative will provide contact telephone numbers for the available carriers. Lists used by the customer service representatives will contain carriers' names in random order.

Customers applying for service will be encouraged to make a carrier selection. New customers will make an affirmative selection before they will be assigned to any carrier for either their intraLATA 1+ or interLATA 1+ service. New customers will be advised that neither intraLATA 1+ dialed calls or interLATA 1+ dialed calls originated from the customer's local line will be possible until a carrier selection is made. Until a selection is made, non-selecting customers will need to dial a carrier access code to make either intraLATA or interLATA toll calls.

Heartland Communications, Inc. upon being contacted by either new or existing customers and receiving requests for a preferred carrier or preferred carrier change shall not market its own intraLATA 1+ service on that same call, but may answer customer initiated questions.

7. Request for approval of Plan.

Heartland Communications, Inc. asks that the Commission grant its official approval of this Plan no earlier than June 22, 1999.

Dated this 16th day of June, 1999.

Respectfully submitted,

Manager, Heartland Communications, Inc.

Heartland Communications, Inc. IntraLATA Dialing Parity Timeline

8

Carrier notifications completed by: June 1, 1999

Carrier responses due by: June 16, 1999

Customer notification completed by: June 25, 1999

Due date for customer response forms: July 12, 1999

IntraLATA dialing parity implementation date: July 22, 1999

End of 60 day grace period: September 20, 1999

APPENDIX A

Date

TO: All Long Distance Carriers of Record in the State of South Dakota

Heartland Communications, Inc. (HCI) is pleased to announce the provisioning of IntraLATA equal access in certain local exchange areas. A list of these exchanges is attached. This service will be made available to customers on July 22, 1999

It is Heartland Communications, Inc. intent to work closely with all users of access and maintain an impartial position with regard to the end user's selection of an IntraLATA long distance carrier. Heartland Communications, Inc. will supply a PIC list for the end user's selection of an IntraLATA long distance carrier. However, because IntraLATA equal access will be provisioned via South Dakota Network (SDN) at 2900 West 10th Street, Sioux Falls, SD 57104, interconnection and access may be ordered via SDN.

Please complete and return the attached form if you wish to be a carrier of choice on the IntraLATA equal access PIC list for the exchanges listed on the next page.

Questions may be directed to Janice Christensen, Equal Access Coordinator at 605.995-2576. Technical questions should be directed to Dale Stanek, Outside Plant Superintendent at 605.778.6221.

You must return your request for participation postmarked no later than June 16, 1999, to:

Janice Christensen, Equal Access Coordinator Marin and Associates, Inc. 1515 North Sanborn Boulevard Mitchell, SD 57301-1021 Fax # 605-995-2577

Sincerely,

Janice Christensen, Equal Access Coordinator Martin and Associates, Inc.

cc: Bill Bullard, South Dakota Public Utilities Commission

Heartland Communications, Inc. exchanges to provide IntraLATA equal access:

TOWN	NPA	NXX
Platte	605	337

APPENDIX B

INTRALATA PIC LIST PARTICIPATION FORM FOR Heartland Communications, Inc.

CARRIER NAME	
ACNA	
CIC	
BILLING ADDRESS	
BILLING CONTACT	
PHONE NUMBER	
FAX NUMBER	
E-MAIL ADDRESS	
CUSTOMER SERVICE NUMBER (BUSINESS)	
CUSTOMER SERVICE NUMBER (RESIDENCE)	
WOULD YOU LIKE TO BE INCLUDED ON THE INTRALATA PIC LIST?	YES
SIGNATURE	
TITLE	
DATE	

Please respond by June 16, 1999.

Janice Christensen, Equal Access Coordinator Martin and Associates, Inc. 1515 North Sanborn Boulevard Mitchell, SD 57301-1021 Fax # 605-995-2577

8

Date:

To: All Customers of Heartland Communications, Inc.

Heartland Communications, Inc. is pleased to announce that effective July 22, 1999, we will make it possible for you to choose from various long distance companies for your in-state 1+ long distance service (intraLATA long distance service). This service includes all of your intrastate long distance calls made by dialing 1 plus the area code and local telephone number. With these changes, you will have the ability to select a long distance company for your in-state 1+ long di ance service.

In conjunction with making these changes, Heartland Communications, Inc. is asking all of its local exchange subscribers to choose whether they wish to retain the current long distance company providing their in-state 1+ long distance service or select another company for the service.

Currently, Heartland Long Distance provides your in-state 1+ long distance service. This company will continue to provide service to you unless you select another carrier. If you do nothing, your in-state 1+ long distance service will remain with Heartland Long Distance. Attached is a list of long distance companies, in addition to Heartland Long Distance, that have agreed to provide 1+ in-state long distance services in your area. If you wish to change your 1+ in-state (intraLATA) long distance carrier, you must directly contact the long distance company that you've chosen in order to initiate that change.

You will not be charged for making a change to your existing in-state 1+ long distance service in response to this notice. In addition, for a period of 60 days after July 22, 1999, you may decide to change your in-state 1+ long distance carrier, one time, at no charge. After September 20, 1999, you will incur a Primary Interexchange Carrier (PIC) charge of \$5.00 for changing carriers.

Please call our office at 605-337-2874 if you have any questions on this matter.

Sincerely,

Heartland Communications, Inc.

Listed below are the other long distance companies that are willing to offer you intraLATA 1+ (generally in-state) long distance services. If you x sh to change your intraLATA 1+ long distance carrier, please directly contact the long distance company that you've chosen in order to initiate that change.

ABC Telephone Company, Inc. Bus/Res: 1-800-555-1234

LMNOP Telecommunications Bus: 1-800-55-2345

ZXC Telephone Company Bus/Res: 1-800-555-3456

Please respond on or before July 12, 1999.

3

Michael Cores Talaphone Co

Hanson County Telephone Company

BRYAN K. ROTH, GENERAL MANAGER P.O. Box 217 Alexandria, S.D. 57311 Telephone: (605) 239-4302 FAX: (605) 239-4301

Juna: 16, 1999

RECEIVED

Bill Bullard, Executive Director South Dakota Public Utilities Commission State Capitol Building 500 East Capitol Ave. Pierre, South Dakota 57501 JUN 1 8 1999

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

RE: Docket TC99-030 (Implementation Plan for IntraLATA Dialing Parity)

Dear Bill:

Enclosed for filing in the above referenced Docket is the revised "Implementation Plan for IntraLATA Toll Dialing Parity" of Hanson County Telephone Company.

If Commission Staff or the Commissioners desire any additional information to supplement this filing, please advise.

Thank you for your assistance in filing and distributing these documents.

Sincerely. Berle Linda Bjerke

Administrative Assistant

Enclosures

RECEIVED

JUN 1 8 1999

IMPLEMENTATION PLAN FOR INTRALATA TOLL DIALING PARITY

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

Hanson County Telephone Company submits this Implementation Plan for IntraLATA Toll Dialing Parity (hereinafter referenced as "the Plan") pursuant to 47 C.F.R. § 51.213 and recent Orders of the South Dakota Public Utilities Commission (hereinafter referenced as the "Commission") which require this filing on or before April 22, 1999. The purpose of the Plan is to provide information to the Commission concerning how and when Hanson County Telephone Company will convert to intraLATA toll dialing parity, r, as it is sometimes called, intraLATA equal access. The provisioning of such capability will permit customers to select which long distance carrier they want to handle their intraLATA 1+ calls.

1. Company name and address:

Hanson County Telephone Company PO Box 217 Alexandria, SD 57311-0217 Telephone: 605-239-4302 Fax: 605-239-4301

2. Associated LATA:

Hanson County Telephone Company is located in and for purposes of this Plan associates with LATA 605.

3. Description of offering.

Hanson County Telephone Company will offer intraLATA toll dialing parity through the "full 2-PIC" presubscription software installed on a centralized basis at the access tandem switch of South Dakota Network, Inc. ("SDN"). The "full 2-PIC" method of presubscription allows a customer to presubscribe to one long distance carrier for all 1+ intraLATA toll calls and to presubscribe to the same or another long distance carrier for all 1+ interLATA toll calls. Directory assistance calls reached by dialing 1+ the telephone number are included in this intraLATA presubscription process. Because the intraLATA toll dialing parity capability will be provisioned via SDN at 2900 West 10th, Sioux Falls, SD 57104, interconnection and access necessary for participation in the offering may be ordered by long distance carriers via SDN.

4. Included local exchange areas and conversion date.

IntraLATA toll dialing parity through SDN will be made available in the following local exchange areas beginning July 22, 1999:

Alexandria 605-239

ı

5. Interexchange carrier "carrier" notification.

All carriers certified in South Dakota to provide long distance services will be notified by June 1, 1999, of the conversion to intraLATA toll dialing parity (a sample copy of the carrier notification letter to be used is attached hereto as Appendix A). These carriers will be asked to respond by June 16, 1999, if they want to participate in the intraLATA toll presubscription process (a sample copy of the form which carriers will complete to indicate their participation in the presubscription process is attached hereto as Appendix B). Carriers that choose to participate in the presubscription process, shall submit verified preferred carrier change orders to Hanson County Telephone Company to effectuate requests by subscribers for their intraLATA toll service.

Hanson County Telephone Company will make available preconversion customer ame and address lists. These customer lists are available to assist participating carriers in their presubscription solicitation efforts. These lists may be provided subject to a reasonable non-discriminatory fee, with delivery contingent upon the carrier meeting all requirements for participation in the intraLATA presubscription process.

6. Customer notification.

A. Current customers.

Customers, including payphone service providers, will be notified of the conversion to intraLATA toll dialing parity by letter postmarked no later than June 25, 1999. In such letter, customers will be advised of their intraLATA choices. Customers will be given the option to remain with their existing intraLATA 1+ carrier, Express Communications, Inc., or to choose a different intraLATA carrier for their 1+ service. The letter will include a list indicating all carriers in addition to the existing 1+ carrier that have chosen to participate in the intraLATA toll presubscription process (a sample copy of the customer notification letter that will be used is attached hereto as Appendix C). The list of carriers will include a toll free telephone number for each carrier listed.

Customers will be advised that if they choose a carrier other than their existing intraLATA 1+ carrier, they must directly contact the long distance company that they've chosen in order to initiate that change. Those customers choosing to stay with their existing intraLATA 1+ carrier, will not have to take any action. Their intraLATA 1+ service will remain with their current provider. Based on letters of agency received directly from participating carriers, Hanson County Telephone Company, as of the date and time that intraLATA dialing parity is implemented, will execute all necessary carrier selection changes.

Customers will not be charged for making any change to their intraLATA 1+ carrier during the presubscription process. In addition, customers will be advised that they will be given 60 days after the intraLATA toll dialing parity implementation date to change their intraLATA 1+ carrier at no charge. Any preferred carrier freeze obtained by customers previously on their interLATA 1+ service shall not be extended to prevent their participation in the intraLATA toll presubscription process. Any preferred carrier freeze on a customer's intraLATA 1+ service shall be specifically authorized by the customer.

In the event that no access service requests are received and no carriers other than Express Communications, Inc. choose to participate in the intraLATA 1+ offering, Hanson County Telephone Company shall still provide notice to its subscribers that 1+ dialing parity for intraLATA toll calls is available.

B. New customers.

New customers to Hanson County Telephone Company's local exchange service, commencing such service after June 25, 1999, will be asked to choose both an intraLATA and interLATA carrier. They will be informed that regulations require that they choose a carrier for their intraLATA 1+ service (for calls within this LATA) and also choose a carrier for their interLATA 1+ service (for calls going outside this LATA). Hanson County Telephone Company will either inform or provide new customers a list of all carrie. a participating in intraLATA 1+ services and all carriers participating in interLATA 1+ services. Customer service representatives of Hanson County Telephone Company will reference the names of all carriers in the customer's exchange area providing 1+ toll service. If the customer requests, the customer service representative will provide contact telephone numbers for the available carriers. Lists used by the customer service representatives will contain carriers' names in random order.

Customers applying for service will be encouraged to make a carrier selection. New customers will make an affirmative selection before they will be assigned to any carrier for either their intraLATA 1+ or interLATA 1+ service. New customers will be advised that neither intraLATA 1+ dialed calls or interLATA 1+ dialed calls originated from the customer's local line will be possible until a carrier selection is made. Until a selection is made, non-selecting customers will need to dial a carrier access code to make either intraLATA or interLATA toll calls.

Hanson County Telephone Company upon being contacted by either new or existing customers and receiving requests for a preferred carrier or preferred carrier change shall not market its own intraLATA 1+ service on that same call, but may answer customer initiated questions.

7. Request for approval of Plan.

Hanson County Telephone Company asks that the Commission grant its official approval of this Plan no earlier than June 22, 1999.

Dated this 16th day of June, 1999.

Respectfully submitted

Bryan K. Roth General Manager Hanson County Telephone Company

Hanson County Telephone Company IntraLATA Dialing Parity Timeline

Carrier notifications completed by: June 1, 1999

Carrier responses due by: June 16, 1999

Customer notification completed by: June 25, 1999

Due date for customer response forms: July 12, 1999

IntraLATA dialing parity implementation date: July 22, 1999

End of 60 day grace period: September 20, 1999

APPENDIX A

Date

TO: All Long Distance Carriers of Record in he State of South Dakota

Hanson County Telephone Company is pleased to announce the provisioning of IntraLATA equal access in certain local exchange areas. A list of these exchanges is attached. This service will be made available to customers on July 22, 1999.

It is Hanson County Telephone Company's intent to work closely with all users of access and maintain an impartial position with regard to the end user's selection of an IntraLATA long distance carrier. Hanson will supply a PIC list for the end user's selection of an IntraLATA long distance carrier. However, because IntraLATA equal access will be provisioned via South Dakota Network (SDN) at 2900 West 10th Street, Sioux Falls, SD 57104, interconnection and access may be ordered via SDN.

Please complete and return the attached form if you wish to be a carrier of choice on the IntraLATA equal access PIC list for the exchange listed on the next page.

Questions may be directed to Carla Bambas at 605-239-4302.

You must return your request for participation postmarked no later than June 16, 1999, to:

Carla Bambas Hanson County Telephone Company PO Box 217 Alexandria, SD 57311-0217 Fax #605-239-4301

Sincerely,

Bryan K. Roth General Manager

cc: Bill Bullard, South Dakota Public Utilities Commission

TOWN	NPA	NXX
Alexandria	605	239

Hanson County Telephone Company exchange to provide IntraLATA equal access:

APPENDIX B

INTRALATA PIC LIST PARTICIPATION FORM FOR HANSON COUNTY TELEPHONE COMPANY

CARRIER NAME	
ACNA	
CIC	
BILLING ADDRESS	
BILLING CONTACT	
PHONE NUMBER	
FAX NUMBER	
E-MAIL ADDRESS	
CUSTOMER SERVICE NUMBER (BUSINESS)	
CUSTOMER SERVICE NUMBER (RESIDENCE)	
WOULD YOU LIKE TO BE INCLUDED ON THE INTRALATA PIC LIST?	YES NO
SIGNATURE	
TITLE	
DATE	

Please respond by June 16, 1999.

Carla Bambas Hanson County Telephone Company PO Box 217 Alexandria, SD 57311-0217

APPENDIX C

Date:

To: All Customers of Hanson County Telephone Company

Hanson County Telephone Company is pleased to announce that effective July 22, 1999, we will make it possible for you to choose from various long distance companies for your in-state 1+ long distance service (intraLATA long distance service). This service includes all of your intrastate long distance calls made by dialing 1 plus the area code and local telephone number. With these changes, you will have the ability to select a long distance company for your in-state 1+ long distance service.

In conjunction with making these changes, Hanson County Telephone Company is asking all of its local exchange subscribers to choose whether they wish to retain the current long distance company providing their in-state 1+ long distance service or select another company for the service.

Currently Express Communications, Inc. provides your in-state 1+ long distance service. This company will continue to provide service to you unless you select another carrier. If you do nothing, your in-state 1+ long distance service will remain with Express Communications, Inc.

Attached is a list of long distance companies, in addition to Express Communications, Inc., that have agreed to provide 1+ in-state long distance services in your area. If you wish to change your 1+ in-state (intraLATA) long distance carrier, you must directly contact the long distance company that you've chosen in order to initiate that change.

You will not be charged for making a change to your existing in-state 1+ long distance service in response to this notice. In addition, for a period of 60 days after July 22, 1999, you may decide to change your in-state 1+ long distance carrier, one time, at no charge. After September 20, 1999, you will incur a Primary Interexchange Carrier (PIC) charge of \$5.00 for changing carriers.

Please call our office at 239-4302 if you have any questions on this matter.

Sincerely,

Hanson County Telephone Company

Listed below are the other Long Distance companies that are willing to offer you IntraLATA 1+ (generally in-state) long distance services. If you wish to change your intraLATA 1+ long distance carrier, please directly contact the long distance company that you've chosen in order to initiate that change.

ABC Telephone Company, Inc. Bus/Res: 1-800-555-1234

LMNOP Telecommunications Bus: 1-800-555-2345

ZXC Telephone Company Bus/Res: 1-800-555-3456

Please respond on or before July 12, 1999.

Hanson Communications, Inc.

Bryan K. Roth, CEO P.O. Box 630 Salem, S.D. 57058 Telephone (605) 425-2238 FAX: (605) 425-2712

June 16, 1999

HCT

RECEIVED

Bill Bullard, Executive Director South Dakota Public Utilities Commission State Capitol Building 500 East Capitol Ave. Pierre, South Dakota 57501 JUN 1 8 1999

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

RE: Docket TC99-030 (Implementation Plan for IntraLATA Dialing Parity)

Dear Bill:

Enclosed for filing in the above referenced Docket is the revised "Implementation Plan for IntraLATA Toll Dialing Parity" of Hanson Communications, Inc. dba McCook Telecom.

If Commission Staff or the Commissioners desire any additional information to supplement this filing, please advise.

Thank you for your assistance in filing and distributing these documents.

Sincerely,

Sinder Bjicke

Linda Bjerke Administrative Assistant

Enclosures

RECEIVED

JUN 1 8 1999

IMPLEMENTATION PLAN FOR INTRALATA TOLL DIALING PARITY

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

Hanson Communications, Inc. dba McCook Telecom submits this Implementation Plan for IntraLATA Toll Dialing Parity (hereinafter referenced as "the Plan") pursuant to 47 C.F.R. § 51.213 and recent Orders of the South Dakota Public Utilities Commission (hereinafter referenced as the "Commission") which require this filing on or before April 22, 1999. The purpose of the Plan is to provide information to the Commission concerning how and when Hanson Communications, Inc. dba McCook Telecom will convert to intraLATA toll dialing parity, or, as it is sometimes called, intraLATA equal access. The provisioning of such capability will permit customers to select which long distance carrier they want to handle their intraLATA 1+ calls.

1. Company name and address:

Hanson Communications, Inc. dba McCook Telecom PO Box 630 Salem, SD 57058-0630 Telephone: 605-425-2238 Fax: 605-425-2712

2. Associated LATA:

Hanson Communications, Inc. dba McCook Telecom is located in and for purposes of this Plan associates with LATA 605.

3. Description of offering.

Hanson Communications, Inc. dba McCook Telecom will offer intraLATA toll dialing parity through the "full 2-PIC" presubscription software installed on a centralized basis at the access tandem switch of South Dakota Network, Inc. ("SDN"). The "full 2-PIC" method of presubscription allows a customer to presubscribe to one long distance carrier for all 1+ intraLATA toll calls and to presubscribe to the same or another long distance carrier for all 1+ interLATA toll calls. Directory assistance calls reached by dialing 1+ the telephone number are included in this intraLATA presubscription process. Because the intraLATA toll dialing parity capability will be provisioned via SDN at 2900 West 10th, Sioux Falls, SD 57104, interconnection and access necessary for participation in the offering may be ordered by long distance carriers via SDN.

4. Included local exchange areas and conversion date.

IntraLATA toll dialing parity through SDN will be made available in the following local exchange areas beginning July 22, 1999:

Salem 605-425

5. Interexchange carrier "carrier" notification.

All carriers certified in South Dakota to provide long distance services will be notified by June 1, 1999, of the conversion to intraLATA toll dialing parity (a sample copy of the carrier notification letter to be used is attached hereto as Appendix A). These carriers will be asked to respond by June 16, 1999, if they want to participate in the intraLATA toll presubscription process (a sample copy of the form which carriers will complete to indicate their participation in the presubscription process is attached hereto as Appendix B). Carriers that choose to participate in the presubscription process, shall submit verified preferred carrier change orders Hanson Comunications, Inc. dba McCook Telecom to effectuate requests by subscribers for their intraLATA toll service.

Hanson Communications, Inc. dba McCook Telecom will make available preconversion customer name and address lists. These customer lists are available to assist participating carriers in their presubscription solicitation efforts. These lists may be provided subject to a reasonable non-discriminatory fee, with delivery contingent upon the carrier meeting all requirements for participation in the intraLATA presubscription process.

6. Customer notification.

A. Current customers.

Customers, including payphone service providers, will be notified of the conversion to intraLATA toll dialing parity by letter postmarked no later than June 25, 1999. In such letter, customers will be advised of their intraLATA choices. Customers will be given the option to remain with their existing intraLATA 1+ carrier, Express Communications, Inc., or to choose a different intraLATA carrier for their 1+ service. The letter will include a list indicating all carriers in addition to the existing 1+ carrier that have chosen to participate in the intraLATA toll presubscription process (a sample copy of the customer notification letter that will be used is attached hereto as Appendix C). The list of carriers will include a toll free telephone number for each carrier listed.

Customers will be advised that if they choose a carrier other than their existing intraLATA 1+ carrier, they must directly contact the long distance company that they've chosen in order to initiate that change. Those customers choosing to stay with their existing intraLATA 1+ carrier, will not have to take any action. Their intraLATA 1+ service will remain with their current provider. Based on letters of agency received directly from participating carriers, Hanson Communications, Inc. dba McCook Telecom, as of the date and time that intraLATA dialing parity is implemented, will execute all necessary carrier selection changes.

Customers will not be charged for making any change to their intraLATA 1+ carrier during the presubscription process. In addition, customers will be advised that they will be given 60 days after the intraLATA toll dialing parity implementation date to change their intraLATA 1+ carrier at no charge.

2

Any preferred carrier freeze obtained by customers previously on their interLATA 1+ service shall not be extended to prevent their participation in the intraLATA toll presubscription process. Any preferred carrier freeze on a customer's intraLATA 1+ service shall be specifically authorized by the customer.

In the event that no access service requests are received and no carriers other than Express Communications, Inc. choose to participate in the intraLATA 1+ offering, Hanson Communications, Inc. dba McCook Telecom shall still provide notice to its subscribers that 1+ dialing parity for intraLATA toll calls is available.

B. New customers.

New customers to Hanson Communications, Inc. dba McCook Telecom's local exchange service, commencing such service after June 25, 1999, will be asked to choose both an intraLATA and interLATA carrier. They will be informed that regulations require that they choose a carrier for their intraLATA 1+ service (for calls within this LATA) and also choose a carrier for their interLATA 1+ service (for calls going outside this LATA). Hanson Communications, Inc. dba McCook Telecom will either inform or provide new customers a list of all carriers participating in intraLATA 1+ services and all carriers participating in interLATA 1+ service representatives of Hanson Communications, Inc. dba McCook Telecom will reference the names of all carriers in the customer's exchange area providing 1+ toll service in the customer's exchange area. If the customer requests, the customer service representative will provide contact telephone numbers for the available carriers. Lists used by the customer service representatives will contain carriers' names in random order.

Customers applying for service will be encouraged to make a carrier selection. New customers will make an affirmative selection before they will be assigned to any carrier for either their intraLATA 1+ or interLATA 1+ service. New customers will be advised that neither intraLATA 1+ dialed calls or interLATA 1+ dialed calls originated from the customer's local line will be possible until a carrier selection is made. Until a selection is made, non-selecting customers will need to dial a carrier access code to make either intraLATA or interLATA toll calls.

Hanson Communications, Inc. dba McCook Telecom upon being contacted by either new or existing customers and receiving requests for a preferred carrier or preferred carrier change shall not market its own intraLATA 1+ service on that same call, but may answer customer initiated questions.

7. Request for approval of Plan.

Hauson Communications, Inc. dba McCook Telecom asks that the Commission grant its official approval of this Plan no earlier than June 22, 1999.

Dated this 16th day of June, 1999.

Respectfully submitted,

Bryan K. Roth, CEO Hanson Communications, Inc. dba McCook Telecom

Hanson Communications, Inc. dba McCook Telecom IntraLATA Dialing Parity Timeline

Carrier notifications completed by: June 1, 1999

Carrier responses due by: June 16, 1999

Customer notification completed by: June 25, 1999

Due date for customer response forms: July 12, 1999

IntraLATA dialing parity implementation date: July 22, 1999

End of 60 day grace period: September 20, 1999

APPENDIX A

Date May 17, 1999

TO: All Long Distance Carriers of Record in the State of South Dakota

Hanson Communications, Inc. dba McCook Telecom is pleased to announce the provisioning of IntraLATA equal access in certain local exchange areas. A list of these exchanges is attached. This service will be made available to customers on July 22, 1999.

It is Hanson Communications, Inc. dba McCook Telecom's intent to work closely with all users of access and maintain an impartial position with regard to the end user's selection of an IntraLATA long distance carrier. Hanson Communication, Inc. dba McCook Telecom will supply a PIC list for the end user's selection of an IntraLATA long distance carrier. However, because IntraLATA equal access will be provisioned via South Dakota Network (SDN) at 2900 West 10th Street, Sioux Falls, SD 57104, interconnection and access may be ordered via SDN.

Please complete and return the attached form if you wish to be a carrier of choice on the IntraLATA equal access PIC list for the exchanges listed on the next page.

Questions may be directed to Linda Bjerke at (605-425-2238).

You must return your request for participation postmarked no later than June 16, 1999, to:

Linda Bjerke Hanson Communications, Inc. dba McCook Telecom PO Box 630 Salem, SD 57058-0630 Fax # 605-425-2712

Sincerely,

Bryan K. Roth, CEO

cc: Bill Bullard, South Dakota Public Utilities Commission

Hanson Communications, Inc. dba McCook Telecom exchanges to provide IntraLATA equal access:

0154 .00 .071

TOWN	NPA	NXX
Salem	605	425
		Contraction Provident

APPENDIX B

INTRALATA PIC LIST PARTICIPATION FORM FOR HANSON COMMUNICATIONS, INC. DBA MCCOOK TELECOM

CARRIER NAME	
ACNA	
CIC	
BILLING ADDRESS	
BILLING CONTACT	
PHONE NUMBER	
FAX NUMBER	
E-MAIL ADDRESS	
CUSTOMER SERVICE NUMBER (BUSINESS)	
CUSTOMER SERVICE NUMBER (RESIDENCE)	
WOULD YOU LIKE TO BE INCLUDED ON THE INTRALATA PIC LIST?	YES
SIGNATURE	
TITLE	
DATE	

Please respond by June 16, 1999.

Linda Bjerke Hanson Communications, Inc. dba McCook Telecom PO Box 630 Salem, SD 57058-0636

8

APPENDIX C

Date:

To: All Customers of

Hanson Communications, Inc. dba McCook Telecom

Hanson Communications, Inc. dba McCook Telecom is pleased to announce that effective July 22, 1999, we will be make it possible for you to choose from various long distance companies for your in-state 1+long distance service (intraLATA long distance service). This service includes all of your intrastate long distance calls made by dialing 1 plus area code and local telephone number. With these changes, you will have the ability to select a long distance company for your in-state 1+ long distance service.

In conjunction with making these changes, Hanson Communications, Inc. dba McCook Telecom is asking all of its local exchange subscribers to choose whether they wish to retain the current long distance company providing their in-state 1+ long distance service or select another company for the service.

Currently Express Communications, Inc. provides your in-state 1+ long distance service. This company will continue to provide service to you unless you select another carrier. If you do nothing, your in-state 1+ long distance service will remain with Express Communications, Inc.

Attached is a list of long distance companies, in addition to Express Communications, Inc., that have agreed to provide 1+ in-state long distance services in your area. If you wish to change your 1+ in-state (intraLATA) long distance carrier, you must directly contact the long distance company that you've chosen in order to initiate that change.

You will not be charged for making a change to your existing in-state 1+ long distance service in response to this notice. In addition, for a period of 60 days after July 22, 1999, you may decide to change your in-state 1+ long distance carrier, one time, at no charge. After September 20, 1999, you will incur a Primary Interexchange Carrier (PIC) charge of \$5.00 for changing carriers.

Please call our office at 611 if you have any questions on this matter.

Sincerely,

Hanson Communications, Inc. dba McCook Telecom

LIST

Listed below are the other Long Distance companies that are willing to offer you IntraLATA 1+ (generally in-state) long distance services. If you wish to change your intraLATA 1+ long distance carrier, please directly contact the long distance company that you've chosen in order to initiate that change.

ABC Telephone Company, Inc. Bus/Res: 1-800-555-1234

LMNOP Telecommunications Bus: 1-800-555-2345

ZXC Telephone Company Bus/Res: 1-800-555-3456

0

Please respond on or before July 12, 1999.



RECEIVED

JUN 21 1999

IMPLEMENTATION PLAN FOR INTRALATA TOLL DIALING PARITY

SOUTH DAKOTA PUBLIC

Vivian Telephone Company d.b.a. Golden West Communications, Inc. submits this Implementation Plan for IntraLATA Toll Dialing Parity (hereinafter referenced as "the Plan") pursuant to 47 C.F.R. § 51.213 and recent Orders of the South Dakota Public Utilities Commission (hereinafter referenced as the "Commission") which require this filing on or before April 22, 1999. The purpose of the Plan is to provide information to the Commission concerning how and when Golden West Communications, Inc. will convert to intraLATA toll dialing parity, or, as it is sometimes called, intraLATA equal access. The provisioning of such capability will permit customers to select which long distance carrier they want to handle their intraLATA 1+ calls

1. Company name and address:

Golden West Communications, Inc. 410 Crown Street, PO Box 411 Wall SD 57790-0411 Tele: 605-279-2161 Fax: 605-279-2727

2. Associated LATA:

Golden West Communications, Inc. is located in and for purposes of this Plan associates with LATA 605

3. Description of offering.

Golden West Communications, Inc. will offer intraLATA toll dialing parity through the deployment of "full 2-PIC" presubscription software at each end office location. The "full 2-PIC" method of presubscription allows a customer to presubscribe to one long distance carrier for all 1+ intraLATA toll calls and to presubscribe to the same or another long distance carrier for all 1+ interLATA toll calls. Directory assistance calls reached by dialing 1+ the telephone number are included in this intraLATA presubscription process. Interconnection and/or access necessary for participation in the offering may be ordered by long distance carriers directly from Golden West Communications, Inc.

4. Included local exchange areas and conversion date.

IntraLATA toll dialing parity through these software upgrades will be made available in the following local exchange areas beginning July 22, 1999:

	1.12 1.12	· 和新知識的情報的目的
Lesterville, SD	605	364
Marion, SD	605	648

1

5. Interexchange carrier "carrier" notification.

50.00

All carriers certified in South Dakota to provide long distance services will be notified by June 1, 1999, of the conversion to intraLATA toll dialing parity (a sample copy of the carrier notification letter to be used is attached hereto as Appendix A). These carriers will be asked to respond by June 16, 1999, if they want to participate in the intraLATA toll presubscription process (a sample copy of the form which long distance carriers will complete to indicate their participation in the presubscription process is attached hereto as Appendix B). Carriers that choose to participate in the presubscription process, shall submit verified preferred carrier change orders to Golden West Communications, Inc. to effectuate requests by subscribers for their intraLATA toll service.

Golden West Communications, Inc. will make available preconversion customer name and address lists. These customer lists are available to assist participating carriers in their presubscription solicitation efforts. These lists may be provided subject to a reasonable, non-discriminatory fee, with delivery contingent upon the carrier meeting all requirements for participation in the intraLATA presubscription process.

6. Customer notification.

A. Current customers.

Customers, including payphone service providers, will be notified of the conversion to intraLATA toll dialing parity b letter postmarked no later than June 25, 1999. In such letter, customers will be advised of their intraLATA choices. Customers will be given the option to remain with their existing intraLATA 1+ carrier, US WEST COMMUNICATIONS, or to choose a different intraLATA carrier for their 1+ service. The letter will include a list indicating all carriers in addition to the existing 1+ carrier that have chosen to participate in the intraLATA toll presubscription process (a sample copy of the customer notification letter that will be used is attached hereto as Appendix C). The list of carriers will include a toll free telephone number for each carrier listed.

Customers will be advised that if they choose a carrier other than their existing intraLATA 1+ carrier, they must directly contact the long distance company that they've chosen in order to initiate that change. Those customers choosing to stay with their existing intraLATA 1+ carrier, will not have to take any action. Their intraLATA 1+ service will remain with their current provider. Based on letters of agency received directly from participating carriers, Golden West Communications, Inc., as of the date and time that intraLATA dialing parity is implemented, will execute all necessary carrier selection changes.

Customers will not be charged for making any change to their intraLATA 1+ carrier during the presubscription process. In addition, customers will be advised that they will be given 60 days after the intraLATA toll dialing parity implementation date to change their intraLATA 1+ carrier at no charge.

Any preferred carrier freeze obtained by customers previously on their interLATA 1+ service shall not be extended to prevent their participation in the intraLATA toll presubscription process. Any preferred carrier freeze on a customer's intraLATA 1+ service shall be specifically authorized by the customer.

In the event that no access service requests are received and no carriers other than U S West Communications choose to participate in the intraLATA 1+ offering, Golden West Communications shall still provide notice to its subscribers that 1+ dialing parity for intraLATA toll calls is available.

B. New customers.

New customers to Golden West Communications, Inc.'s local exchange service, commencing such service after conversion, will be asked to choose both an intraLATA and interLATA carrier. They will be informed that regulations require that they choose a carrier for their intraLATA 1+ service (for calls within this LATA) and also choose a long distance carrier for their interLATA 1+ service (for calls going outside this LATA). Golden West Communications, Inc. will either inform or provide new customers a list of all carriers participating in intraLATA 1+ services and all carriers participating in interLATA 1+ services. Customer service representatives of Golden West Communications, Inc. will reference the names of all carriers in the customer's exchange area providing 1+ toll service in the customer's exchange area. If the customer requests, the customer service representative will provide contact telephone numbers for the available carriers. Lists used by the customer service representatives will contain carriers' names in random order.

Customers applying for service will be encouraged to make a carrier selection. New customers will make an affirmative selection before they will be assigned to any carrier for either their intraLATA 1+ or interLATA 1+ service. New customers will be advised that neither intraLATA 1+ dialed calls or interLATA 1+ dialed calls originated from the customer's local line will be possible until a carrier selection is made. Until a selection is made, non-selecting customers will need to dial a carrier access code to make either intraLATA or interLATA toll calls.

Golden West Communications upon being contacted by either new or existing customers and receiving requests for a preferred carrier or preferred carrier change shall not market its own intraLATA 1+ service on that same call, but may answer customer initiated questions.

7. Request for approval of Plan.

Golden West Communications, Inc. asks that the Commission grant its official approval of this Plan no earlier than June 22, 1999.

Dated this 18th day of June, 1999.

Respectfully submitted,

Jack Brown, Management Consultant Golden West Communications, Inc. Golden West Communications, Inc. IntraLATA Dialing Parity Timeline

Carrier notifications completed by: June 1, 1999

Carrier responses due by: June 16, 1999

0154.30.579

Customer notification completed by: June 25, 1999

Due date for customer response forms: July 12, 1999

IntraLATA dialing parity implementation date: July 22, 1999

End of 60 day grace period: September 20, 1999

Date: June 1, 1999

TO: All Long Distance Carriers of Record in the State of South Dakota

Golden West Communications, Inc. (GWC) is pleased to announce the provisioning of IntraLATA equal access in certain local exchange areas. A list of these exchanges is attached. This service will be made available to customers on July 22, 1999.

It is GWC's intent to work closely with all users of access and maintain an impartial position with regard to the end user's selection of an IntraLATA long distance company. GWC will supply a PIC list for the end user's selection of an IntraLATA long distance company. IntraLATA equal access will be provisioned on an end office basis and therefore interconnection and access may be ordered through Golden West Communications, Inc.

Please complete and return the attached form if you wish to be a carrier of choice on the IntraLATA equal access PIC list for the exchanges listed on the next page.

Questions may be directed to Janice Christensen, Equal Access Coordinator at 605-996-9646. Technical questions should be directed to Greg Goddicksen, Inside Plant Supervisor at 605-745-3103.

You must return your request for participation postmarked no later than June 16, 1999, to:

Janice Christensen, Equal Access Coordinator Golden West Communications, Inc. 1515 North Sanborn Boulevard Mitchell, SD 57301-1021 Tele # 605-996-9646 Fax # 605-995-2577

Sincerely,

Jack Brown, Management Consultant Golden West Communications, Inc.

cc: South Dakota Public Utilities Commission

TOWN	NPA	NXX
Lesterville, SD	605	364
Marion, SD	605	648

Golden West Communications, Inc. exchanges to provide IntraLATA equal access:

APPENDIX B

INTRALATA PIC LIST PARTICIPATION FORM FOR GOLDEN WEST COMMULICATIONS, INC.

CARRIER NAME	
ACNA	
CIC	
BILLING ADDRESS	
BILLING CONTACT	
PHONE NUMBER	
FAX NUMBER	
E-MAIL ADDRESS	
CUSTOMER SERVICE NUMBER (BUSINESS)	
CUSTOMER SERVICE NUMBER (RESIDENCE)	
WOULD YOU LIKE TO BE INCLUDED ON THE INTRALATA PIC LIST?	YES NO
SIGNATURE	
TTILE	
DATE	

Please respond by June 16, 1999.

Address:

Janice Christensen, Equal Access Coordinator Golden West Communications, Inc. 1515 North Sanborn Boulevard Mitchell, SD 57301-1021 Fax # 605-995-2577 Date: June 25, 1999

To: All Customers of Golden West Communications, Inc.

Golden West Communications, Inc. is pleased to announce that effective July 22, 1999, we will make it possible for you to choose from various long distance companies for your in-state 1+ long distance service (intraLATA long distance service). This service includes all of your intrastate long distance calls made by dialing 1 plus the area code and local telephone number. With these changes, you will have the ability to select the long distance company for your in-state 1+ long distance service.

In conjunction with making these changes, Golden West Communications, Inc. is asking all of its local exchange subscribers to choose whether they wish to retain the current long distance company providing their in-state 1+ long distance service or select another company for the service.

Currently, US WEST COMMUNICATIONS provides your in-state 1+ long distance service. This company will continue to provide service to you unless you select another carrier. If you do nothing, your in-state 1+ long distance service will remain with US WEST COMMUNICATIONS.

Attached is a list of long distance companies, in addition to US WEST COMMUNICATIONS, that have agreed to provide 1+ in-state long distance services in your area. If you wish to change your 1+ in-state (intraLATA) long distance carrier, you must directly contact the long distance company that you've chosen in order to initiate that change.

You will not be charged for making a change to your existing in-state 1+ long distance service in response to this notice. In addition, for a period of 60 days after July 22, 1999, you may decide to change your in-state 1+ long distance carrier, one time, at no charge. After September 20, 1999, you will incur a Primary Interexchange Carrier (PIC) charge of \$5.00 for changing carriers.

Please call our office at 605-279-1020 or "811", from a Golden West service area, if you have any questions on this matter.

Sincerely,

Golden West Communications, Inc.

Listed below are the other Long Distance companies that are willing to offer you IntraLATA 1+ (generally in-state) long distance services. If you wish to change your intraLATA 1+ long distance carrier, please directly contact the long distance company that you've chosen in order to initiate that change.

ABC Telephone Company, Inc Bus/Res: 1-800-555-1234

LMNOP Telecommunications Bus: 1-800-555-2345

ZXC Telephone Company Bus/Res: 1-800-555-3456

If you wish to change your intraLATA 1+ long distance carrier, please contact the long distance company of your choice on or before July 12, 1999.

LIST

FAX Received 18 18

RECEIVED

JUN 2 1 1999

IMPLEMENTATION PLAN FOR INTRALATA TOLL DIALING PARITY

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

Vivian Telephone Company d.b.a. Golden West Communications, Inc. submits this Implementation Plan for IntraLATA Toll Dialing Parity (hereinafter referenced as "the Plan") pursuant to 47 C.F.R. § 51.213 and recent Orders of the South Dakota Public Utilities Commission (hereinafter referenced as the "Commission") which require this filing on or before April 22, 1999. The purpose of the Plan is to provide information to the Commission concerning how and when Golden West Communications, Inc. will convert to intraLATA toll dialing parity, or, as it is sometimes called, intraLATA equal access. The provisioning of such capability will permit customers to select which long distance carrier they want to handle their intraLATA 1+ calls.

1. Company name and address:

Golden West Communications, Inc. 410 Crown Street, PO Box 411 Wall, SD 57790-0411 Tele: 605-279-2161 Fax: 605-279-2727

2. Associated LATA:

0154

- 20

GIL

Golden West Communications, Inc. is located in and for purposes of this Plan associates with LATA 605.

3. Description of offering.

Golden West Communications, Inc. will offer intraLATA toll dialing parity through the "full 2-PIC" presubscription software installed on a centralized basis at the access tandem switch of South Dakota Network, Inc. ("SDN"). The "full 2-PIC" method of presubscription allows a customer to presubscribe to one long distance carrier for all 1+ intraLATA toll calls and to presubscribe to the same or another long distance carrier for all 1+ intraLATA toll calls. Directory assistance calls reached by dialing 1+ the telephone number are included in this intraLATA presubscription process. Because the intraLATA toll dialing parity capability will be provisioned via SDN at 2900 West 10th, Sioux Falls, SD 57104, interconnection and access necessary for participation in the offering may be ordered by long distance carriers via SDN. 4. Included local exchange areas and conversion date.

IntraLATA toll dialing parity through SDN will be made available in the following local exchange areas beginning July 22, 1999:

Exchange	NPANXX
So. Bonesteel, NE	402(653)
So. Burke, NE	402(774)
Gregory, NE	402(974)
Avon, SD	605(286)
Springfield, SD	605(369)
Menno, SD	605(387)
Reliance, SD	605(473)
Clearfield, SD	605(557)
Scotland, SD	605(583)
Bonesteel, SD	605(654)
Murdo, SD	605(669)
Custer, SD	605(673)
Vivian, SD	605(683)
Rosebud, SD	605(747)
Burke, SD	605(775)
Gregory, SD	605(835)
Winner, SD	605(842)
Mission, SD	605(856)
Witten, SD	605(879)
Freeman, SD	605(925)

5. Interexchange carrier "carrier" notification.

All carriers certified in South Dakota to provide long distance services will be notified by June 1, 1999, of the conversion to intraLATA toll dialing parity (a sample copy of the carrier notification letter to be used is attached hereto as Appendix A). These carriers will be asked to respond by June 16, 1999, if they want to participate in the intraLATA toll presubscription process (a sample copy of the form which carriers will complete to indicate their participation in the presubscription process is attached hereto as Appendix B). Carriers that choose to participate in the presubscription process, shall submit verified preferred carrier change orders to Golden West Communications, Inc. to effectuate requests by subscribers for their intraLATA toll service.

Golden West Communications, Inc. will make available preconversion customer name and address lists. These customer lists are available to assist participating carriers in their presubscription solicitation efforts. These lists may be provided subject to a reasonable non-discriminatory fee, with delivery contingent upon the carrier meeting all requirements for participation in the intraLATA presubscription process.

6. Customer notification.

A. Current customers.

Customers, including payphone service providers, will be notified of the conversion to intraLATA toll dialing parity by letter postmarked no later than June 25, 1999. In such letter, customers will be advised of their intraLATA choices. Customers will be given the option to remain with their existing intraLATA 1+ carrier, Golden West Long Distance, or to choose a different intraLATA carrier for their 1+ service. The letter will include a list indicating all carriers in addition to the existing 1+ carrier that have chosen to participate in the intraLATA toll presubscription process (a sample copy of the customer notification letter that will be used is attached hereto as Appendix C). The list of carriers will include a toll free telephone number for each carrier listed.

Customers will be advised that if they choose a carrier other than their existing intraLATA 1+ carrier, they must directly contact the long distance company that they've chosen in order to initiate that change. Those customers choosing to stay with their existing intraLATA 1+ carrier, will not have to take any action. Their intraLATA 1+ service will remain with their current provider. Based on letters of agency received directly from participating carriers, Golden West Communications, Inc., as of the date and time that intraLATA dialing parity is implemented, will execute all necessary carrier selection changes.

Customers will not be charged for making any change to their intraLATA 1+ carrier during the presubscription process. In addition, customers will be advised that they will be given 60 days after the intraLATA toll dialing parity implementation date to change their intraLATA 1+ carrier at no charge.

Any preferred carrier freeze obtained by customers previously on their interLATA 1+ service shall not be extended to prevent their participation in the intraLATA toll presubscription process. Any preferred carrier freeze on a customer's intraLATA 1+ service shall be specifically authorized by the customer.

In the event that no access service requests are received and no carriers other than Golden West Communications choose to participate in the intraLATA 1+ offering, Golden West Communications shall still provide notice to its subscribers that 1+ dialing parity for intraLATA toll calls is available.

B. New customers.

New customers to Golden West Communications, Inc.'s local exchange service, commencing such service after conversion, will be asked to choose both an intraLATA and interLATA carrier. They will be informed that regulations require that they choose a carrier for their intraLATA 1+ service (for calls within this LATA) and also choose a carrier for their interLATA 1+ service (for calls going outside this LATA). Golden West Communic ions, Inc. will either inform or provide new customers a list of all carriers partic pating in intraLATA 1+ services and all carriers participating in interLATA 1+ services. Customer service representatives of Golden West Communications, Inc. will reference the names of all carriers in the customer's exchange area providing 1+ toll service. If the customer requests, the customer service representative will provide contact telephone numbers for the available carriers. Lists used by the customer service representatives will contain carriers' names in random order.

Customers applying for service will be encouraged to make a carrier selection. New customers will make an affirmative selection before they will be assigned to any carrier for either their intraLATA 1+ or interLATA 1+ service. New customers will be advised that neither intraLATA 1+ dialed calls or interLATA 1+ dialed calls or interLATA 1+ dialed calls originated from the customer's local line will be possible until a carrier selection is made. Until a selection is made, non-selecting customers will need to dial a carrier access code to make either intraLATA or interLATA toll calls.

Golden West Communications upon being contacted by either new or existing customers and receiving requests for a preferred carrier or preferred carrier change shall not market its own intral ATA 1+ service on that same call, but may answer customer initiated questions.

7. Request for approval of Plan.

Golden West Communications, Inc. asks that the Commission grant its official approval of this Plan no earlier than June 22, 1999.

Dated this 18th day of June, 1999.

Respectfully submitted,

Jack Brown, Management Consultant Golden West Communications, Inc. Golden West Communications, Inc. IntraLATA Dialing Parity Timeline

Carrier notifications completed by: June 1, 1999

Carrier responses due by: June 16, 1999

Customer notification completed by: June 25, 1999

Due date for customer response: July 12, 1999

IntraLATA dialing parity implementation date: July 22, 1999

End of 60 day grace period: September 20, 1999

APPENDIX A

Late: June 1, 1999

TO: All Long Distance Carriers of Record in the State of South Dakota

Golden West Communications, Inc. (GWC) is pleased to announce the provisioning of IntraLATA equal access in certain local exchange areas. A list of these exchanges is attached. This service will be made available to customers on July 22, 1999.

It is GWC's intent to work closely with all users of access and maintain an impartial position with regard to the end user's selection of an IntraLATA long distance carrier. GWC will supply a PIC list for the end user's selection of an IntraLATA long distance carrier. However, because IntraLATA equal access will be provisioned via South Dakota Network (SDN) at 2900 West 10th Street, Sioux Falls, SD 57104, interconnection and access may be ordered via SDN.

Please complete and return the attached form if you wish to be a carrier of choice on the IntraLATA equal access PIC list for the exchanges listed on the next page.

Questions may be directed to Janice Christensen, Equal Access Coordinator at 605-996-9646. Technical questions should be directed to Greg Goddicksen, Inside Plant Supervisor at 605-745-3103.

You must return your request for participation postmarked no later than June 16, 1999, to:

Janice Christensen, Equal Access Coordinator Golden West Communications, Inc. 1515 North Sanborn Boulevard Mitchell, SD 57301-1021 Tele # 605-996-9646 Fax # 605-995-2577

Sincerely,

Jack Brown, Management Consultant Golden West Communications, Inc.

cc: Bill Bullard, South Dakota Public Utilities Commission

Golden West Communications, Inc. exchanges to provide IntraLATA equal access:

TOWN	NPA	NXX
So. Bonesteel, NE	402	653
So. Burke, NE	402	774
Gregory, NE	402	974
Avon, SD	605	286
Springfield, SD	605	369
Menno, SD	605	387
Reliance, SD	605	473
Clearfield, SD	605	557
Scotiand, SD	605	583
Bonesteel, SD	605	654
Murdo, SD	605	669
Custer, SD	605	673
Vivian, SD	605	683
Rosebud, SD	605	747
Burke, SD	605	775
Gregory, SD	605	835
Winner, SD	605	842
Mission, SD	605	856
Witten, SD	605	879
Freeman, SD	605	925

7

APPENDIX B

INTRALATA PIC LIST PARTICIPATION FORM FOR GOLDEN WEST COMMUNICATIONS, INC.

CARRIER NAME	
ACNA	
CIC	
BILLING ADDRESS	
BILLING CONTACT	
PHONE NUMBER	
FAX NUMBER	
E-MAIL ADDRESS	
CUSTOMER SERVICE NUMBER (BUSINESS)	
CUSTOMER SERVICE NUMBER (RESIDENCE)	
WOULD YOU LIKE TO BE INCLUDED ON THE INTRALATA PIC LIST?	YES NO
SIGNATURE	
TITLE	
DATE	

Please respond by June 16, 1999.

Address:

Janice Christensen, Equal Access Coordinator Golden West Communications, Inc. 1515 North Sanborn Boulevard Mitchell, SD 57301-1021 Fax # 605-995-2577

8

Date: June 25, 1999

0154 .30 .593

To: All Customers of Golden West Communications, Inc.

Golden West Communications, Inc. is pleased to announce that effective July 22, 1999, we will make it possible for you to choose from various long distance companies for your in-state 1+ long distance service (intraLATA long distance service). This service includes all of your intrastate long distance calls made by dialing 1 plus the area code and local telephone number. With these changes, you will have the ability to select a long distance company for your in-state 1+ long distance service.

In conjunction with making these changes, Golden West Communications, Inc. is asking all of its local exchange subscribers to choose whether they wish to retain the current long distance company providing their in-state 1+ long distance service or select another company for the service.

Currently, Golden West Long Distance provides your in-state 1+ long distance service. This company will continue to provide service to you unless you select another carrier. If you do nothing, your in-state 1+ long distance service will remain with Golden West Long Distance.

Attached is a list of long distance companies, in addition to Golden West Long Distance, that have agreed to provide 1+ in-state long distance services in your area. If you wish to change your 1+ in-state (intraLATA) long distance carrier, you must directly contact the long distance company that you've chosen in order to initiate that change.

You will not be charged for making a change to your existing in-state 1+ long distance service in response to this notice. In addition, for a period of 60 days after July 22, 1999, you may decide to change your in-state 1+ long distance carrier, one time, at no charge. After September 20, 1999, you will incur a Primary Interexchange Carrier (PIC) charge of \$5.00 for changing carriers.

Please call our office at 605-279-1020 or "811", from a Golden West service area, if you have any questions on this matter.

Sincerely,

Golden West Communications, Inc.

LIST

Listed below are the other Long Distance companies that are willing to offer you intraLATA 1+ (generally in-state) long distance services. If you wish to change your intraLATA 1+ long distance carrier, please directly contact the long distance company that you've chosen in order to initiate that change.

ABC Telephone Company, Inc. Bus/Res: 1-800-555-1234

LMNOP Telecommunications Bus: 1-800-555-2345

ZXC Telephone Company Bus/Res: 1-800-555-3456

If you wish to change your intraLATA 1+ long distance carrier, please contact the long distance company of your choice on or before July 12, 1999. JUN-18-88 11:15AM FROM-GOLDEN WEST WALL

6052792727

1

IMPLEMENTATION PLAN FOR INTRALATA TOLL DIALING PARITY

Vivian Telephone Company db.a. Golden West Communications, Inc. submits this Implementation Plan for IntraLATA Toll Dialing Parity (hereinafter referenced as "the Plan") pursuant to 47 C.F.R. § 51.213 and recent Orders of the South Dakota Public Utilities Commission (hereinafter referenced as the "Commission") which require this filing on or before April 22, 1999. The purpose of the Plan is to provide information to the Commission concerning how and when Golden West Communications, Inc. will convert to intraLATA toll dialing parity, or, as it is sometimes called, intraLATA equal access. The provisioning of such capability will permit customers to select which long distance carrier they want to handle their intraLATA 1+ calls.

Company name and address:

Golden West Communications, Inc. 410 Crown Street, PO Box 411 Wall, SD 57790-0411 Tele: 605-279-2161 Fax: 605-279-2727

2 Associated LATA:

Golden West Communications, Inc. is located in and for purposes of this Plan associates with LATA 605.

3. Description of offering.

Golden West Communications, Inc. will offer intraLATA toll dialing parity through the "full 2-PIC" presubscription software installed on a centralized basis at the access tandem switch of South Dakota Network, Inc. ("SDN"). The "full 2-PIC" method of presubscription allows a customer to presubscribe to one long distance carrier for all 1+ intraLATA toll calls and to presubscribe to the same or another long distance carrier for all 1+ intraLATA toll calls. Directory assistance calls reached by dialing 1+ the telephone number are included in this intraLATA presubscription process. Because the intraLATA toll dialing parity capability will be provisioned via SDN at 2900 West 10th, Sioux Falls, SD 57104, interconnection and access necessary for participation in the offering may be ordered by long distance carriers via SDN.

4. Included local exchange areas and conversion date.

IntraLATA toll dialing parity through SDN will be made available in the following local exchange areas beginning July 22, 1999:

	Automatical States
So. Bonesteel, NE	402(653)
So. Burke, NE	402(774)
Gregory, NE	402(974)
Avon, SD	605(286)
Springfield, SD	605(369)
Menno, SD	605(387)
Reliance, SD	605(473)
Clearfield, SD	605(557)
Scotland, SD	605(583)
Bonesteel, SD	605(654)
Murdo, SD	505(669)
Custer, SD	605(673)
Vivian, SD	605(683)
Rosebud, SD	605(747)
Burke, SD	605(775)
Gregory, SD	605(835)
Winner, SD	605(842)
Mission, SD	605(856)
Witten, SD	605(879)
Freeman, SD	605(925)

5 Interexchange carrier "carrier" notification.

All carriers certified in South Dakota to provide long distance services will be notified by June 1, 1999, of the conversion to intraLATA toll dialing parity (a sample copy of the carrier notification letter to be used is attached hereto as Appendix A). These carriers will be asked to respond by June 16, 1999, if they want to participate in the intraLATA toll presubscription process (a sample copy of the form which carriers will complete to indicate their participation in the presubscription process is attached hereto as Appendix B). Carriers that choose to participate in the presubscription process, shall submit verified preferred carrier change orders to Golden West Communications, Inc. to effectuate requests by subscribers for their intraLATA toll service.

Golden West Communications, Inc. will make available preconversion customer name and address lists. These customer lists are available to assist participating carriers in their presubscription solicitation efforts. These lists may be provided subject to a reasonable non-discriminatory fee, with delivery contingent upon the carrier meeting all requirements for participation in the intraLATA presubscription process.

6. Customer notification.

A. Current customers.

Customers, including payphone service providers, will be notified of the conversion to instraLATA toil dialing parity by letter postmarked no later than June 25, 1999. In such letter, customers will be advised of their intraLATA choices. Customers will be given the option to remain with their existing intraLATA 1+ carrier, Golden West Long Distance, or to choose a different intraLATA carrier for their 1+ service. The letter will include a list indicating all carriers in addition to the existing 1+ carrier that have chosen to participate in the intraLATA toll presubscription process (a sample copy of the customer notification letter that will be used is attached hereto as Appendix C). The list of carriers will include a toll free telephone number for each carrier listed.

Customers will be advised that if they choose a carrier other than their existing intraLATA 1+ carrier, they must directly contact the long distance company that they've chosen in order to initiate that change. Those customers choosing to stay with their existing intraLATA 1+ carrier, will not have to take any action. Their intraLATA 1+ service will remain with their current provider. Based on letters of agency received directly from participating carriers, Golden West Communications, Inc., as of the date and time that intraLATA dialing parity is implemented, will execute all necessary carrier selection changes.

Customers will not be charged for making any change to their intraLATA 1+ carrier during the presubscription process. In addition, customers will be advised that they will be given 60 days after the intraLATA toll dialing parity implementation date to change their intraLATA 1+ carrier at no charge.

Any preferred carrier freeze obtained by customers previously on their interLATA 1+ service shall not be extended to prevent their participation in the intraLATA toll presubscription process. Any preferred carrier freeze on a customer's intraLATA 1+ service shall be specifically authorized by the customer.

In the event that no access service requests are received and no carriers other than Golden West Communications choose to participate in the intraLATA 1+ offering, Golden West Communications shall still provide notice to its subscribers that 1+ dialing parity for intraLATA toll calls is available.

B. New customers.

New customers to Golden West Communications, Inc.'s local exchange service, commencing such service after conversion, will be asked to choose both an intraLATA and interLATA carrier. They will be informed that regulations require that they choose a carrier for their intraLATA 1+ service (for calls within this LATA) and also choose a carrier for their interLATA 1+ service (for calls going outside this LATA). Golden West Communications, Inc. will either inform or provide new customers a list of all carriers participating in intraLATA 1+ services and all carriers participating in interLATA 1+ services. Customer service representatives of Golden West Communications, Inc. will reference the names of all carriers in the customer's exchange area providing 1+ toll service. If the customer requests, the customer service representative will provide contact telephone numbers for the available carriers. Lists used by the customer service representatives will contain carriers' names in random order.

Customers applying for service will be encouraged to make a carrier selection. New customers will make an affirmative selection before they will be assigned to any carrier for either their intraLATA 1+ or interLATA 1+ service. New customers will be advised that neither intraLATA 1+ dialed calls or interLATA 1+ dialed calls originated from the customer's local line will be possible until a carrier selection is made Until a selection is made, non-selecting customers will aeed to dial a carrier access code to make either intraLATA or interLATA toll calls.

Golden West Communications upon being contacted by either new or existing customers and receiving requests for a preferred carrier or preferred carrier change shall not market its own intraLATA 1+ service on that same call, but may answer customer initiated questions.

7. Request for approval of Plan.

Golden West Communications, Inc. asks that the Commission grant its official approval of this Plan no earlier than June 22, 1999.

Duted this 18th day of June, 1999.

Respectfully submitted,

Jack Brown, Management Consultant Golden West Communications, Inc.

Golden West Communications, Inc. IntraLATA Dialing Parity Timeline

Carrier notifications completed by: June 1, 1999

Carrier responses due by: Jeane 16, 1999

Customer notification completed by: June 25, 1999

Due date for customer response: July 12, 1999

IntraLATA dialing parity implementation date: July 22, 1999

End of 60 day grace period: September 28, 1999

JUN-18-80 11:18AM FROM-GOLDEN WEST MALL

6052792727

APPENDIX A

Date: June 1, 1999

TO: All Long Distance Carriers of Record in the State of South Dakota

Golden West Communications, Inc. (GWC) is pleased to announce the provisioning of IntraLATA equal access in certain local exchange areas. A list of these exchanges is attached. This service will be made available to customers on July 22, 1999.

It is GWC's intent to work closely with all users of access and maintain an impartial position with regard to the end user's selection of an IntraLATA long distance carrier. GWC will supply a PIC list for the end user's selection of an IntraLATA long distance carrier. However, because IntraLATA equal access will be provisioned via South Dakota Network (SDN) at 2900 West 10th Street, Sioux Falls, SD 57104, interconnection and access may be ordered via SDN.

Please complete and return the attached form if you wish to be a carrier of choice on the IntraLATA equal access PIC list for the exchanges listed on the next page.

Questions may be directed to Janice Christensen, Equal Access Coordinator at 605-996-9646. Technical questions should be directed to Greg Goddicksen, Inside Plant Supervisor at 605-745-3103.

You must return your request for participation postmarked no later than kine 16, 1999, to:

Janice Christensen, Equal Access Coordinator Golden West Communications, Inc. 1515 North Sanborn Boulevard Mitchell, SD 57301-1021 Tele # 605-996-9646 Fax # 605-995-2577

6

Sincerely,

Jack Brown, Management Consultant Goldon West Communications, Inc.

oc: Bill Bullard, South Dakots Public Utilities Commission

8052782727

10

TOWN	NPA	NXX
So. Bonnsteel, NE	402	653
So. Burke, NE	402	774
Gregory, NE	402	974
Avoa, SD	605	286
Springfield, SD	605	369
Manno, SD	605	387
Reliance, SD	605	473
Clearfield, SD	605	557
Scotland, SD	605	583
Boarcsteel, SD	605	654
Mardo, SD	605	669
Custer, SD	605	673
Vivian, SD	605	683
Rosebud, SD	605	747
Burke, SD	605	775
Gregory, SD	605	835
Winner, SD	605	842
Mission, SD	605	856
Witten, SD	605	879
Freeman, SD	605	925

Golden West Communications, Inc. exchanges to provide IntraLATA equal access:

7

APPENDEX B

INTRALATA PIC LIST PARTICIPATION FORM FOR GOLDEN WEST COMMUNICATIONS, INC.

YES NO

Planse respond by June 16, 1999.

Address:

Jamice Christenson, Equal Access Coordinator Golden West Communications, Inc. 1515 North Sanborn Boulevard Mitchell, SLI 57301-1021 Fan. # 605-995-2577

5

JUR-10-00 11:17AM FROM-GOLDEN WEST MILL

8052782727

APPENDEX C

Date: June 25, 1999

To: All Customers of Golden West Communications, Inc.

Golden West Communications, Inc. is pleased to announce that effective July 22, 1999, we will make it possible for you to choose from various long distance companies for your in-state 1+ long distance service (intraLATA long distance service). This service includes all of your intrastate long distance calls made by dialing 1 plus the area code and local telephone number. With these changes, you will have the ability to select a long distance company for your in-state 1+ long distance service.

In conjunction with making these changes, Golden West Communications, Inc. is asking all of its local exchange subscribers to choose whether they wish to retain the current long distance company providing their in-state 1+ long distance service or select another company for the service.

Currently, Golden West Long Distance provides your in-state 1+ long distance service. This company will continue to provide service to you unless you select another carrier. If you do nothing, your in-state 1+ long distance service will remain with Golden West Long Distance.

Attached is a list of long distance companies, in addition to Golden West Long Distance, that have agreed to provide 1+ in-state long distance services in your area. If you wish to change your 1+ in-state (naraLATA) long distance carrier, you must directly contact the long distance company that you've chosen in order to initiate that change.

You will not be charged for making a change to your existing in-state 1+ long distance service in response to this notice. In addition, for a period of 60 days after July 22, 1999, you may decide to change your in-state 1+ long distance carrier, one time, at no charge. After September 20, 1999, you will incur a Primary Interexchange Carrier (PIC) charge of \$5.00 for changing carriers.

Piease call our office at 605-279-1020 or "811", from a Golden West service area, if you have any questions on this matter.

Sincernly,

Golden West Communications, Inc.

JUR-18-00 11:17AM FROM-GOLDEN WEST WALL

n

8052782727

LIST

Listed below are the other Long Distance companies that are willing to offer you intraLATA 1+ (renerally in-state) long distance services. If you wish to change your intraLATA 1+ long distance c_reier, please directly contact the long distance company that you've chosen in order to initiate that change.

ABC Telephone Company, Iac. Bun/Res: 1-800-555-1234

LMNOP Telecommunications Bur: 1-800-555-2345

ZXC Telephone Company But/Res: 1-800-555-3456

If you wish to change your intraLATA 1+ long distance carrier, please contact the long distance company of your choice on or before July 12, 1999.

10



I car Bill:

Please find enclosed the amended dialing parity plan for Midcontinent Communications, as ordered under TC99-030. We believe we meet the requirements as stated in the Commission's 6/15/99 order.

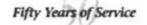
In addition to this facsimile copy, Midcontinent will submit a signed original and seven copies by regular postmarked no later than 5:00 PM, Friday, June 18, 1999

Thank you.

Sincerely, Midcontinent Communications

4 W. Tom Simmons

Vice President & General Manager Commercial Services



RECEIVED

BEFORE THE PUBLIC UTILITIES COMMISSISON OF THE STATE OF SOUTH DAKOTA

FAX Received_JUN 1 8 1999

JUN 21 1999

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE FCC ORDER)	TC99-030
ESTABLISHING NEW DEADLINES FOR)	MIDCO COMMUNICATIONS
IMPLEMENTATION OF INTRALATA DIALING)	INTRALATA TOLL DIALING
PARITY BY LOCAL EXCHANGE CARRIERS)	PLAN

Pursuant to the Order of the South Dakota Public Utilities Commission, Midco Communications hereby submits this intraLATA toll dialing plan for Commission review and approval, according to the guidelines ordered April 2, 1999:

 a description of how the LEC will offer dialing parity for each exchange and its proposed time schedule;

Currently, Midco Communications provides local exchange service only as a reseller of US West services under an approved agreement on file with the South Dakota Public Utilities Commission. Midco's ability to offer dialing parity depends in large part on the dialing parity plan developed by US West. Subject to coordination with the US West plan, Midco intends to support intraLATA dialing parity in the same manner it currently supports interLATA dialing parity in each US West exchange.

Midco Communications also intends to provide facilities based local service in selected US West exchanges. The details of providing that service is contained in an interconnection agreement between Midco Communications, Inc. and US West, Inc., pending approval of the South Dakota Public Utilities Commission (Docket TC99-023). Section 11 of the Agreement addresses dialing parity, offering the full two-PIC option in conformance with Section 271 of the

0-154 -30 -606

Telecommunications Act. The Agreement also guarantees that for resale, or when Port/Switching Services are provided by US West, any end-user will be able to access the Midco network for services using the same dialing protocol that the end user would use to access the same service on the US West network.

2) a proposal for timely notification of its subscribers and the methods it proposes to use to enable subscribers to select an intraLATA toll provider, including the language the LEC proposes to use in its customer notification letter. The proposals shall include notification to current customers and new customers who join the network after the implementation of dialing parity;

Within thirty days following the approval of this plan, Midco Communications will notify current customers, including payphone service providers, of options to select an intraLATA toll provider through a "Customer Notification Letter". Customers who choose a carrier other than their current carrier will be advised to contact the carrier they've chosen to initiate the change. Should customers contact Midcontinent Communications to initiate a change, Midcontinent will not market its products or services. Midcontinent will answer customer initiated questions, and attempt to explain the process and options. Customers choosing to stay with their current intraLATA carrier will not have to take any action. The "Customer Notification Letter" will include a list of intraLATA carriers in addition to the existing 1- carrier that have indicated a desire to participate in the intraLATA toll presubscription process. The specific language of the "Customer Notification

Letter* follows as Exhibit A. Additionally, within thirty days following the approval of this plan, Midco Communications will modify its Letter of Authorization (LOA) to confirm the customers choice of providers for: 1) Local exchange service, 2) IntraLATA toll, and 3) InterLATA toll service. The specific language of follows as Exhibit B.

Customers will be advised that they can change their intraLATA 1+ carrier during the first 60 days following the intraLATA toll dialing parity implementation. presubscription process without charge. After that date, \$5.00 per change will be charged. If a customer currently has an interLATA PIC freeze, that freeze will only be extended to the intraLATA PIC as a result of a separate authorization for the intraLATA PIC freeze. If the customer contacts Midcontinent Communications

 a LEC that is not a BOC must identify the LATA with which it will associate for the purposes of providing intraLATA and interLATA toll dialing parity;

In all cases, Midco Communications is associated with LATA 640, NPA 605.

4) a description of how carriers will be informed of the implementation process and schedule and how carriers may participate in the process; Midco Communications will notify all long distance carriers of record in the State of South Dakota of its implementation process and schedule through a letter. Carriers need not request specific Access Service Requests (ASR's) to be notified. The specific language of the letter follows as Exhibit C.

 a description of how the LEC's business office will handle requests to change carriers.

Requests to change carriers will be handled by the central processing dep urtment, Carriers must send or fax a completed PIC Change Request Form. A sample follows as Exhibit D.

Originally submitted April 21, 1999.

Amended June 18, 1999

Respectfully submitted,

W forn Simons Vice President & General Manager Midcontinent Communications 410 South Phillips Avenue Sioux Falls, SD 57104 Telephone (605) 334-1200

Exhibit A

Customer Notification Letter

Thank you for choosing Midco Communications as your provider for local exchange telephone services. Effective July 22, 1999, we are offering you the opportunity to select in-state 1+ long distance service from various long distance companies. Currently, your in-state long distance carrier is Midcontinent Communications. We urge you to choose an instate provider as soon as possible. If you do nothing, your in-state long distance service cannot be accomplished by dialing 1+. Your choice may include Midcontinent Communications, or any other long distance carrier of record in the state of South Dakota who have indicated a desire to be a carrier of choice on our IntraLATA PIC list. Those carriers who have agreed to provide 1+ in-state long distance service are listed on the following "Carriers of Record" notification.

If you wish to make a change in carriers, you must contact the long distance company that you've chosen to order their service. They will contact us to complete the change.

Should you choose to make a change of in-state long distance carriers between now and September 22, 1999, there will be no charges for the change. After September 22, 1999, a \$5.00 charge per change will appear on your bill.

If you have questions, please do not hesitate to call our customer service department at 605-334-1200 or 1-800-888-1300.

Sincerely, Midcontinent Communications

W. Tom Simmons Vice President & General Manager Commercial Services

CARRIERS OF RECORD

0154 .30 .61

Following is a list of carriers who have indicated an interest in offering intraLATA 1+ in-state long distance service. If you wish to change your intraLATA long distance carrier, please contact the carrier at the number listed to initiate the change.

AAA Telecommunications	1-800-555-4567
BBB Telecommunications	1-800-555-5678
CCC Telecommunications	1-800-555-6789
Midcontinent Communications	1-800-888-1300
PPP Telecommunications	1-800-555-7891
SSS Telecommunications	1-800-555-1234

EXHIBIT B

Date:

Name (Company)_____

Address:

City, State, Zip:_____

Phone:

Mideo Communications, Inc. 410 South Phillips Avenue Sioux Falls, SD 57104-6824

Dear Midco Communications:

This letter authorizes Midco Communications, Inc., to act as our local exchange carrier. I understand that we have a choice in selecting providers of intraLATA (in state long distance) and interLATA (out of state long distance) services. The choice may include Midco Communications, or any other long distance carrier of record in the state of South Dakota who have indicated a desire to be a carrier of choice on the IntraLATA/InterLATA PIC lists.

My IntraLATA (in state long distance) provider is: My InterLATA (out of state long distance) provider is:

By

By

Date:

Date:

We authorize Midco to make appropriate changes for all lines at the address listed above, and understand and agree to any charges that may be incurred for changing lines and PIC's to Midco or other choices indicated above.

Sincerely.

(Company representative)

Date:

EXHIBIT C

Month 00, 1999

To: All Long Distance Carriers of Record In the State of South Dakota

Midcontinent Communications announces provisioning of IntraLATA equal access and dialing parity in the following South Dakota exchanges:

TBA

Midcontinent Communications will work closely with all carriers of record expressing an interest to be a carrier of choice. If you are interested in receiving a copy of our manual, which details ordering procedures, terms and conditions for the provision of Feature Group D, Switched Access Service, and provides the required forms and time tables, please complete and return or fax the enclosed request form to:

> Sharon Stettnichs Manager – Central Processing Midcontinent Communications 410 South Phillips Avenue Sioux Falls, SD 57104-6824 Fax: (605) 357-5423

If you have questions, you may contact Sharon Stettnichs at (605) 334-1200.

Sincerely, Midco Communications

W. Tom Simmons Vice President & General Manager



REQUEST FORM IntraLATA/interLATA Equal Access and Dialing Parity Manual

To: Sharon Stettnichs Manager – Central Processing Midcontinent Communications, Inc. 410 South Phillips Avenue Sioux Falls, SD 57104-6824 Phone: (605) 334-1200 Fax: (605) 357-5423

Sharon:

Please send us your manual for intraLATA equal access and dialing parity with Midco Communications.

Company Name:	
Contact Name:	
Address:	
City, State, Zip:	
Telephone Number:	
Fax Number:	
e-mail:	



EXHIBIT D

PIC CHANGE REQUEST FORM

Use this form to submit intraLATA/interLATA PIC change requests to Midco Communications Central Processing.

Carrier Name:

CIC Code:_____

Contact Name:

Contact Telephone:

Fax Number:_____

LOA ON FILE (Date)

BTN	WTN	loter LATA	Intra LATA	Charge PSP to	Effective Date	Date Input
•		PIC	PIC	Carrier		
		_				
		-				
					1	
				- Sheen		

ATTN: MIDCO CENTRAL PROCESSING (FAX): (605) 357-5423



Michel L. Singer Attorney

C

Room 1575 1875 Lawrence Street Deriver, CO 80202 303 298-6527

June 17, 1999

Via Overnight Delivery

Mr. Bill Bullard Executive Director SD Public Service Commission 500 East Capital Avenue Pierre, SD 57501 RECEIVED JUN 1 8 1999 SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

Re: Implementation of Dialing Parity, Docket No. TC99-030

Dear Mr. Bullard:

Enclosed are an original and ten copies of AT&T Communications of the Midwest Inc.'s Request for Approval of AT&T's Amended Dialing Parity Implementation Plan and Request for Waiver.

Please feel free to call me if there are any questions.

Sincerely. ichel L. Singer

Enclosures

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF SOUTH DAKOTA

)

)

IN THE MATTER OF THE FCC ESTABLISHING NEW DEADLINES FOR IMPLEMENTATION OF INTRALATA DIALING PARITY BY LOCAL EXCHANGE CUSTOMERS

) DOCKET NO. TC99-030

AT&T'S REQUEST FOR APPROVAL OF AMENDED DIALING PARITY IMPLEMENTATION PLAN AND REQUEST FOR WAIVER

AT&T Communications of the Midwest, Inc. ("AT&T") hereby files this Amended Dialing Parity Implementation Plan, incorporated herein as Attachment A, in accordance with the South Dakota Public Utilities Commission's ("Commission") Order dated June 15, 1999.

AT&T also gives notice to this Commission in accordance with Rule 20:10:01:28 that AT&T is technically unable to comply immediately with dialing parity requirement number six (6) as stated in the Commission's Order issued June 15, 1999, and requests a waiver of this requirement. In support of this request, AT&T states as follows:

 For new customers, the Commission's requirement number six (6) requires local exchange carriers to comply with 47 C.F.R. § 51.209(c) which prohibits the automatic assignment of a customer's intraLATA toll traffic. In other words, new customers who do not affirmatively select an intraLATA toll carrier must use dial around numbers to access their provider of choice.

2. The AT&T Digital Link ("ADL") Service will not be technically capable of this provision until early 2000. Until then, AT&T proposes that new customers will be informed that if the customer does not indicate a preference for an alternate carrier, interLATA and intraLATA toll traffic sent over AT&T Digital Link nodal facilities will be carried over AT&T's network as part of the subscribers' new nodal agreement.

 AT&T ADL customers are a unique group of customers in that they are primarily large, sophisticated businesses who choose the ADL service to consolidate traffic over their trunks to achieve the highest discounted rate from AT&T. It is a fact that AT&T ADL customers frequently choose more than one interLATA provider for network redundancy purposes. These customers are savvy regarding the telecommunications service options available to them and are, therefore, likely to affirmatively choose an intraLATA toll provider. Additionally, AT&T's ADL customers are required to maintain at least one local exchange carrier line due to the fact that certain services such as 911 are not available with the ADL service. Consequently few, if any, of AT&T's ADL customers will be impacted by AT&T's present technical inability to process a "no-PIC" choice

WHEREFORE, AT&T requests that the Commission approve AT&T's Amended Dialing Parity Plan for the AT&T Digital Link Service and grant a waiver of the above referenced dialing parity requirement until AT&T is technically able to comply with this requirement.

Respectfully submitted this 17th day of June, 1999.

AT&T COMMUNICATIONS OF THE MIDWEST, INC.

By:/

Maria Arlas-Chapleau Michel Singer AT&T Law Department 1875 Lawrence Street, Suite 1500 Denver, Colorado 80202 Telephone: 303-298-6527 Facsimile: 303-298-6301

ATTACHMENT A

AT&T'S AMENDED DIGITAL LINK DIALING PARITY IMPLEMENTATION PLAN

I. Introduction

0-0- 00- 00-0

AT&T hereby files this Dialing Parity Implementation Plan in accordance with the Federal Communications Commission Order released on March 23, 1999, in Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, Petition of Southwestern Bell Telephone Company, Pacific Bell, and Nevada Bell for Expedited Declaratory Ruling on Interstate IntraLATA Toll Dialing Parity or, in the Alternative, Various Other Relief, CC Docket No. 96-98, NSD File No. 98-121. This Plan sets forth AT&T's proposal for providing intraLATA toll dialing parity within the s.ate of South Dakota for customers subscribing to AT&T Digital Link Service.

II. Methodology

AT&T will provide full 2-PIC (intraLATA toll & interLATA) dialing parity, allowing AT&T Digital Link Service customers to pre-subscribe to one carrier for all interLATA calls and to the same or another carrier for all intraLATA toll calls. One interLATA IXC and one intraLATA IXC may be selected for each trunk subgroup. AT&T will convert all its central offices on a statewide basis. AT&T will provide the capability for pre-subscription, however subscribers must reprogram their PBX to send their traffic to their selected carrier in order for the presubscribed choice to be effective.

III. Availability

AT&T will provide full 2-PIC dialing parity in each LATA in which AT&T offers AT&T Digital Link Service. This service is being offered in South Dakota within U S WEST's territory and concurs with U S WEST's exchange areas and exchange maps filed by U S WEST with the South Dakota Public Utilities Commission.

IV. Subscriber Practices

AT&T will provide notice to its AT&T Digital Link Service subscribers of the forthcoming availability of intraLATA toll and interLATA dialing parity by means of a one-time mailing, a copy of which is attached as Exhibit 1. This mailing will be sent 30 days prior to the implementation of dialing parity.

AT&T will inform new AT&T nodal services and AT&T Digital Link Service customers (i.e., customers that subscribe to local and long distance services on the same day) of the dialing parity feature available to them and, upon request, will provide customers a randomly ordered list of carriers available to them in their geographic area. New customers will also be informed that if the customer does not indicate a preference for an alternate carrier, interLATA and intraLATA toll traffic sent over AT&T Digital Link nodal facilities will be carried over AT&T's network as part of the subscribers' new nodal agreement.

AT&T will utilize competitively neutral business office practices when an *xisting AT&T Digital Link Service subscriber contacts AT&T to request information on dialing parity or to change to an alternate intraLATA toll and/or interLATA provider. Upon request, AT&T will provide customers a randomly ordered list of carriers available to them in their geographic area. Existing subscribers who do not affirmatively select an alternative provider will remain with their pre-existing intraLATA toll and interLATA carrier. Unless an existing AT&T Digital Link Service subscriber requests a change to his or her presubscribed interexchange carrier ("PIC") or to his or her presubscribed intraLATA toll carrier ("PTC"), any interLATA and intraLATA toll traffic sent over AT&T Digital Link nodal facilities will continue to be carried over AT&T's network.

AT&T will accept customer-initiated or carrie initiated requests for alternate interLATA or intraLATA toll carrier on the date of implementation. If all necessary access facilities already exist, the PIC/PTC selection will be processed within three business days. Should the installation of new access facilities (e.g., from the AT&T switch to the LEC access tandem or from the customer premises to the AT&T switch) be required, the PIC/PTC selection will be completed within three business days of the new facilities being fully provisioned and operational. The new facilities will be provisioned within standard provisioning intervals.

At this time, AT&T will not impose charges on its customers for pre-subscribing to an alternate carrier or for changing their PIC/PTC selection.

V. Carrier Practices

AT&T will notify all Feature Group D carriers operating in South Dakota no later than 35 days prior to the implementation of dialing parity. A copy of the carrier notification letter is attached hereto as Exhibit 2.

Any interexchange carrier that wishes to be listed as a provider of intraLATA toll or interLATA service at the time of dialing parity implementation shall notify AT&T no later than 30 days prior to dialing parity availability. ASR requirements are available from the AT&T Carrier Service Center. AT&T will implement ASRs that require the installation of new access facilities in accordance with standard provisioning intervals.

VI. Service to Payphone Providers

The AT&T Digital Link Service is a dedicated T-1 based service, therefore, it is not a service currently available to payphone service providers.

VI. Proposed Implementation Schedule

AT&T will implement dialing parity no later than 30 days after the date on which this plan is approved.

Exhibit 1

Date

Dear Customer,

This is to announce the availability of intraLATA toll and interLATA (including international) pre-subscription in South Dakota. Pre-Subscription gives you the opportunity to choose an alternate carrier to complete your intraLATA toll and/or interLATA calls. LATA is your Local Access and Transport Area. Calls that originate and terminate within your LATA are referred to as intraLATA calls. Calls that cross LATA boundaries are referred to as interLATA calls.

AT&T currently completes your intraLATA toll and 1+ interLATA calls, and will continue to be your long distance company unless you choose otherwise.

Other companies will solicit your intraLATA toll a: I interLATA business. Before making a change, however, please remember that each company's rates, plans and policies are different. We encourage you to contact any long distance company that you are interested in to discuss their services in detail. For your convenience, attached is a list of long distance providers and their toll free numbers.

If you wish to change your intraLATA long distance carrier, you should directly contact the long distance company you have chosen to initiate that change with the local exchange carrier and to ensure your account is properly established. This feature is available to you effective [date]. AT&T will not impose any charges for this feature.

As always, we are grateful for your continued business. If you have any questions, please contact our business office at 1-877-325-5968 on or after [date].

Sincerely,

AT&T Local Services

Exhibit 2

Date:

To: All IntraLATA and InterLATA Carriers.

The purpose of this correspondence is to provide formal notification of AT&T's intention to offer IntraLATA and InterLATA Dialing Parity.

Effective [date] AT&T Digital Link Customers will be permitted to pre-subscribe to alternate and/or separate IntraLATA and InterLATA Carriers.

Carriers interested in participating in this offer should submit the appropriate Access Service Request (ASR) forms to the AT&T Carrier Service Center (CSC) by [date]. Carriers should provide AT&T with their toll free number by writing it on the bottom margin of the ASR form submitted to the AT&T CSC.

Requests for additional information or ASR submission may be directed to AT&T's CSC at the following address:

> AT&T CSC 900 Rtes 202/206 North Room 5C250 Bedminster, NJ 07921-0752 Tel no. 908 234-7480 Fax no. 908 719-7229

Sincerely,

U S WEST, Inc. 1801 California Street, Suite 5100 Denver, CO. 80202 Tatephone (303) 672 2783 Facsimile (303) 672 2783

Todc Lundy Senior Attorney

VIA FEDERAL EXPRESS

June 17, 1999

RECEIVED

USWEST

William Bullard, Jr., Executive Director South Dakota Public Utilities Commission 500 E. Capitol Avenue Pierre, South Dakota 57501-5070 JUN 1 8 1999 SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

RE: Docket No. TC-99-030 In the Matter of the FCC Order Establishing New Deadlines for Implementation of IntraLATA Dialing Parity By Local Exchange Carriers

Dear Sir/Madam:

Enclosed are an original and seven copies of the following:

- U S WEST Communications, Inc.'s Motion for Rehearing, Submission of Revised Dialing Parity Plan Under Reservations of Rights, and Advisement Regarding Customer Notification; and
- U S WEST Communications, Inc.'s South Dakota Revised IntraLATA Toll Dialing Parity Implementation Plan with Reservation of Rights.

Pursuant to your request, you will also receive these documents electronically via e-mail.

Please stamp and return the enclosed extra copy of this letter in the enclosed addressed, postage paid envelope.

Sincerely,

Margine Hertek

Marjorie Herlth Secretary to Todd L. Lundy

Enclosures /moh

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF SOUTH DAKOTA

A SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE FCC ORDER ESTABLISHING NEW DEADLINES FOR IMPLEMENTATION OF INTRALATA DIALING PARITY BY LOCAL EXCHANGE CARRIERS

TC 99-030

U S WEST COMMUNICATIONS, INC. SOUTH DAKOTA REVISED INTRALATA TOLL DIALING PARITY IMPLEMENTATION PLAN WITH RESERVATION OF RIGHTS

June 17, 1999

By: Toda h. budy

Todd L. Lundy Senior Attorney U S WEST, Inc. 1801 California, Suite 5100 Denver, CO 80202 (303) 672-2783 On June 15, 1999, the Commission entered its Order Setting Requirements For P! ns. This Order requires each local exchange carrier to file a dialing parity implementation plan that contains the requirements listed in the Order by June 18, 1999. U S WEST hereby submits its revised plan that complies with the requirements contained in the Commission's Order; however, U S WEST files its revised plan with reservation of its rights to move for re-hearing, to appeal the Commission's orders, and to file any action or proceeding challenging the orders. Further, U S WEST has filed with the Commission a Motion for Rehearing contemporaneously with and as part of this revised plan.

<u>Critical Dates:</u> Pursuant to the discussions among the f rties and the Commissioners during the April 1, 1999 Ad Hoc meeting, as well as the Commission's June 15, 1999 order, U S WEST requests that the Commission employ the following schedule for approval of the components of U S WEST's Plan:

Filing: Plan and associated tariffs and studies	April 22, 1999
Commission Approval of Carrier Notification Process	May 20, 1999
Carrier Notification Occurs	May 23, 1999
Filing: Revised Plan With Reservations	June 18, 1999
Carrier Response Due	June 7, 1999
Commission Approval of Customer Notification	June 22, 1999
Final Commission Plan Approval	June 22, 1999
Customer Notification Mailing	July 1, 1999
Implementation Date	July 22, 1999

Methodology: U S WEST will implement full 2-PIC intraLATA presubscription (ILP) toll dialing parity, thereby allowing end users to presubscribe to one carrier for all interLATA calls and the same or another carrier for all intraLATA calls. U S WEST will convert all U S WEST central offices in South Dakot1 on a statewide basis no later than July 22, 1999, based on Commission approval of U S WEST's toll dialing parity plan no later than June 22, 1999.

U S WEST will file a waiver with the FCC requesting an extension of time to implement toll dialing parity in the following three exchanges: McIntosh (605-273), Timber Lake (605-865), and Morristown (605-524). These exchanges were the subject of sale of exchanges with the Cheyenne River Tribe, and will be converted at a later date. Customers in these exchanges will be notified separately to inform them of the extension of time and the implementation date

Customer Notification: U S WEST shall provide notice to its end user customers of the forthcoming conversion of its serving end offices to intraLATA equal access by means of a one time mailing prior to the scheduled implementation date. (See Exhibit A).

Lines Eligible for IntraLATA Presubscription: Residence, Business and Public Access Lines will be eligible for intraLATA presubscription. The individual responsible for the selection of the interLATA presubscribed carrier will also be responsible for the selection of intraLATA toll provider.

Calls Eligible for IntraLATA Presubscription: 1+NPA/0+NPA designated intraLATA toll calls will be eligible for intraLATA presubscription.

<u>Calls Not Eligible for IntraLATA Presubscription</u>: The following call categories will continue to be carried over the U S WEST network, regardless of the intraLATA selection made for that line.

- Local calls, those defined as local calls in the tariff

- Directory Assistance calls placed without the use of an access code

- U S WEST Call Completion Service

- Calls to N11 codes (e.g., 411, 911) and 555 prefixed numbers

- Calls to Information Delivery Services (IDS) e.g., 960/976

- Calls completed by U S WEST operator (0-)

- Wireless and paging calls

Business Practices New Customers: U S WEST will inform new local exchange end users of their right to select the intraLATA carrier of their choice and agree to take their order for whichever provider they select.

If the customer is uncertain, U S WEST will read from a random list. Customers will be advised that U S WEST is a choice. Should the customer ask any questions, U S WEST will provide information in response to such questions. Customers will be asked for their selection.

If an end user customer requests the 800 toll free number of an interexchange carrier, U S WEST will provide that number to the end user customer when available.

New customers who do not affirmatively select an intraLATA toll provider will not be assigned a carrier and will be required to place intraLATA toll calls utilizing access codes e.g., 101XXXX, 950, 800, etc.

Business Practices Existing Customers: U S WEST will take orders from customers who contact U S WEST to request a change in intraLATA carrier in a competitively neutral manner. Should the customer request information relative to U S WEST toll products and services, U S WEST will respond to the customer's request.

Existing customers who do not affirmatively select an alternative intraLATA provider will remain with their pre-existing intraLATA toll carrier. <u>Carrier Participation</u>: U S WEST will keep carriers informed of implementation details as appropriate. U S WEST will notify all interexchange carriers that currently offer 1+ toll access in U S WEST territory of its anticipated schedule for implementation of 1+ intraLATA equal access. This notification will follow the critical dates timeline addressed earlier in this plan. This notification will also include terms and conditions for an interexchange carrier to participate in intraLATA equal access.

Carriers requiring Feature Group D service should follow the normal Access Service Request process. Please see Exhibit B for a copy of this notice.

<u>Order Processing:</u> U S WEST will begin accepting carrier initiated changes for an intraLATA selection on the date of implementation. The Authorization Date (date the carrier received authorization from the customer to make the change on their behalf) may be no earlier than 30 days prior to the implementation date. Carriers will also receive a positive acknowledgment of the status of their request to change an end user's intraLATA carrier selection.

U S WEST customer contact personnel will be ready to accept changes from existing end user customers on the implementation date.

<u>Charge Application</u>: U S WEST's non-recurring charge for an intraLATA carrier change shall be set equal to the rate currently in effect for an interLATA carrier change charge (\$5.00). Customers shall be allowed one intraLATA carrier change free of charge during the first 60 days following implementation. After that date appropriate service order charges will apply.

Recovery of waived charges during this period will occur via the issuance of a one time bulk bill to each participating carrier. This bill will assess to them the PIC change charge for the total number of lines changed to that PIC.

An intraLATA PIC change charge will be assessed when customers change their carrier for intraLATA services.

The appropriate U S WEST filing(s) with respect to these charges have been filed with the Commission.

<u>Unauthorized PIC Changes "Slamming" Guidelines:</u> Slamming refers to an unacceptable business practice in which a carrier changes an end user's PIC without the end user's consent. Slamming typically occurs when a carrier submits a request to change an end user's PIC or ILP PIC directly to the end user's local exchange service provider and does not follow the appropriate guidelines to obtain the end user's authorization. U S WEST will follow the applicable federal and state regulations for obtaining the appropriate authorization for ILP PIC changes. U S WEST anticipates all participating carriers will also adhere to these rules and statues in marketing to South Dakota customers.

<u>Validation Number</u>: U S WEST will make available upon request from an end user, a toll free number they may call to verify their intraLATA provider. That number is 1 (home NPA) 700-4141. The recorded announcement received when an end user calls that number is the responsibility of the individual carrier. This number will work only for facility-based providers of long distance service.

<u>Cost Recovery:</u> During the April 1, 1999 Ad Hoc Meeting, the Commission commented that some carriers may require additional time to gather cost recovery information, and that cost recovery may involve the examination of evidence by interested parties and the Commission. Therefore, the Commission's April 2, 1999 Order states that, if a LEC believes that it needs cost recovery, the LEC should file for cost recovery in a separate proceeding before the Commission.

U S WEST is compiling the necessary information and will be submitting an application for cost recovery with the Commission. U S WEST requests as part of its Plan that the Commission approve U S WEST's recovery of costs starting on the date of implementation of dialing parity. Cost recovery will coincide with the date of implementation, because other interexchange carriers begin to realize the benefits of U S WEST's expenditures when dialing parity becomes effective.

Following are the categories of intraLATA equal access conversion costs that are appropriate for U S WEST to recover:

- (a) incremental cost of network hardware necessary to provide full 2-PIC methodology in all exchanges
- (b) central office upgrades
- (c) software translations
- (d) system programming/testing
- training of Business Office, Carrier Services, Customer Service and Service Center personnel
- (f) customer notification
- (g) any other implementation costs

U S WEST will recover implementation costs excluding those recovered via the one time bulk-bill process outlined above over a three year period and will establish a new rate element referred to as the Equal Access Network Reconfiguration Charge (EANRC) to be assessed to all carriers. The recovery charge will be applied to the total intrastate intraLATA originating minutes of use for each carrier. U S WEST's cost projections will be subject to review annually and adjusted as appropriate to reflect any over or under recovery that may have occurred.

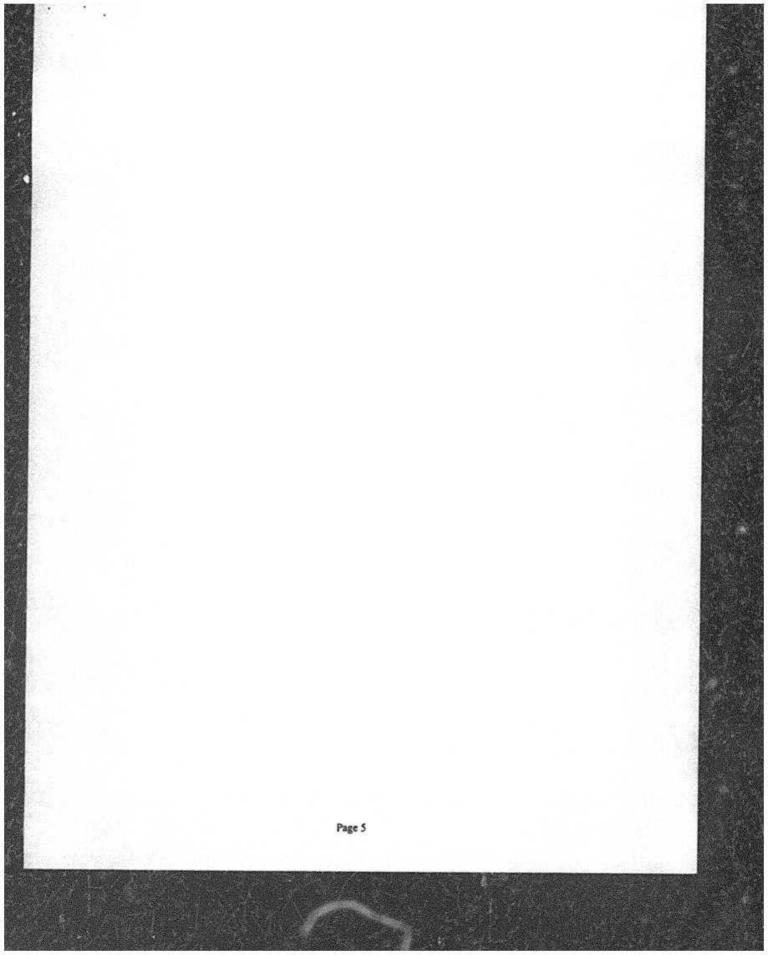


Exhibit A Page 1

NOTICE OF ALTERNATIVES FOR SOUTH DAKOTA IN-STATE CALLING

You may now choose from among many companies, including U S WEST, to handle your South Dakota in-state long distance calls effective July 22, 1999. Currently, U S WEST Communications is your provider for 1+ direct dialed calls within South Dakota.

If you choose to make a change, that change will only apply to calls made within South Dakota. This change will have no impact on long distance calls you place to locations outside South Dakota.

Should you decide to make a change, you may do so by contacting the business office of the company you wish to select. A list of companies you can choose from, including their toll free number, is included with this notice. You may change your in-state long distance provider one time through September 20, 1999, without incurring a carrier change charge. After that date appropriate service charges will apply.

If you do not elect to make a change, U S WEST will continue to be your provider for all 1+ long distance calls you make within South Dakota.

No action on your part is necessary if you want your in-state calls to remain with U S WEST, just as they are today.

This n tice has been approved by the South Dakota Public Utilities Commission.

Exhibit B Page 1 of 3

U S WEST COMMUNICATIONS CARRIER SERVICE DELIVERY

May 23, 1999

TO: ALL ACCESS CUSTOMERS RE: I+ INTRALATA IN SOUTH DAKOTA

SPECIAL ATTENTION RESPONSE REQUIRED BY JUNE 7, 1999

U S WEST Communications will implement statewide intraLATA equal access in South Dakota on July 22, 1999. It is U S WEST's intent to work closely with all access carriers and follow all prescribed processes with regard to the end user's selection of a long distance company.

U S WEST will be sending a one time mailing to end users in South Dakota informing them of the conversion to intraLATA equal access.

> You must submit the attached IntraLATA Equal Access Participation form if you wish to participate in IntraLATA Equal Access in South Dakota. The participation form must be faxed and received by close of business on June 7, 1999.

Note: If installation of Feature Group D tranks is required, the normal ASR (Access Service Request) process must be followed,

If you have not received acknowledgment of receipt of your form within 72 hours, please contact Harriett Berry on (303) 787-5593.

If you have any questions about the IntraLATA conversion, plerse contact your U S WEST Account Executive.

Georgiana Romero Manager Subscription Services Attachment

hberry@uswest.com

Exhibit B Page 2 of 3

U S WEST COMMUNICATIONS

South Dakota IntraLATA Equal Access Participation

Please submit a separate form for each CIC code.

If you want to participate in intraLATA Equal Access in South Dakota, this form must be completed and returned on or before June 7, 1999

FOUR DIGIT CIC

Carrier Listing Information

Please show carrier name and telephone number as it should be listed in U S WEST customer notification. The customer notification will include 1+ conversion information as well as a list of carriers who will be participating as intraLATA carriers.

Carrier Name:

Residence Participation (Y or N) ____

Carrier Telephone Number for Residence Customers

Basiness Participation (Y or N)

Carrier Telephone Number for Business Customers

Participation Contact Name and Number:

Please include the name and number of your company's participation contact.

Return FAX Number

Acknowledgment of receipt cannot be sent without fax number.

This form is for South Dakota participation only. If you wish to add or change your intraLATA participation in another state, you must fill out the participation form located in the Forms Section of the Regional Subscription System User Guide.

Return completed form to Harriett Berry; Fax: (303) 441-6064

Exhibit B Page 3 of 3

U S WEST COMMUNICATIONS

South Dakota IntraLATA Equal Access Participation Acknowledgment

Your South Dakota IntraLATA Equal Access Participation form has been received. You will be included in IntraLATA participation in South Dakota.

Harriett Berry Subscription Staff

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF SOUTH DAKOTA

)

1

RECEIVED

JUN 1 8 1999

IN THE MATTER OF THE FCC ORDER ESTABLISHING NEW DEADLINES FOR IMPLEMENTATION OF INTRALATA DIALING PARITY BY LOCAL EXCHANGE CARRIERS SOUTH DAKOTA PUBLIC UTILITIES COMMISSION TC 99-030

U S WEST'S MOTION FOR REHEARING, SUBMISSION OF REVISED DIALING PARITY PLAN UNDER RESERVATIONS OF RIGHTS, AND ADVISEMENT REGARDING CUSTOMER NOTIFICATION

Pursuant to ARSD 20:10:01:29 and 20:10:01:30.01, U S WEST Communications, Inc. (U S WEST), through counsel, submits its motion for rehearing and reconsideration of the Commission's June 15, 1999 Order Setting Requirements for Plans. U S WEST also submits with this motion its revised intraLATA dialing parity plan, under a reservation of rights, and advises the Commission regarding the timing of customer notifications.

In its June 15, 1999 Order, the Commission requires local exchange carriers to file dialing parity plans that comply with eleven (11) itemized paragraphs. U S WEST filed its original intraLATA dialing parity plan on April 22, 1999. U S WEST has revised its dialing parity plan to comply with the Commission's June 15, 1999 Order, and U S WEST is filing its revised plan along with this motion by the June 18, 1999 date as required by the Commission. However, U S WEST respectfully requests rehearing and reconsideration of three issues raised by the Commission's Order, and also files its revised intraLATA dialing parity plan under a reservation of rights.

MOTION FOR REHEARING AND RECONSIDERATION

The following are the three issues on which U S WEST moves for reconsideration:

 If a customer currently has an interLATA PIC freeze, the LEC may not automatically extend that freeze to the intraLATA PIC. According to FCC rules, separate authorizations must be received for each service for which a carrier freeze is requested. 47 C.F.R. 64.1190(c). Thus, a customer's intraLATA PIC may only be frozen if the customer separately authorized the freeze in accordance with 64.1190-

U S WEST submits that this prohibition is not in the public interest and it will frustrate customers' own efforts to protect themselves from slamming. Customers who initiate a PIC freeze do so because they are concerned about the illegal practice of slamming. Requiring them to initiate a separate intraLATA PIC freeze, when most cutomers are not even aware or are confused about the differences between interLATA and intraLATA services, and simply want protection from slamming, is inconsistent with customers' expectations. If the customer at some point wants to "unfreeze" his or her intraLATA PIC, or switch his or her intraLATA carrier, the customer can do so. In the meantime, however, the customer is protected from slamming, which is clearly what the customer wants to do when choosing to make a PIC freeze in the first place. In short, requiring a customer to separately authorize an intraLATA PIC freeze will only lead to confusion, the lack of full slamming protection, and frustrated and perturbed customers who later find out they were not fully protected from slamming.

South Dakota may stand alone as the only state in which consumers who have sought full slamming protection will not receive it. Of the states in U S WEST's region that have entered final dialing parity orders, eight have approved the inclusion of intraLATA freezes, and the three others did not address the issue. AT&T filed complaints in those three other states. Nebraska dismissed the complaint, and the matters are pending in the other two.

U S WEST respectfully suggests that the issue is not whether U S WEST will comply with the FCC rules effective April 27, 1999; U S WEST has and will continue to do so. The question concerns the expectations and interests of all those other customers that requested PIC

2

freezes on their long distance service before the effectiveness of the FCC requirement to obtain separte authorizations. Those customers will not receive the slamming protection that they initiated and requested.

(3) If an existing or new customer contacts the LEC to pick or change its intraLATA carrier, the LEC may not market its products or services on the same call but may answer customer initiated questions-

U S WEST's intraLATA dialing parity plan filed on April 22, 1999, and its revised plan, are consistent with the Commission's Order, but asserts that the Commission's prohibition upon U S WEST (or any LEC) from marketing its services and products with accurate and nonmisleading information violates U S WEST's first amendment rights to commercial speech. U S WEST has the right to disseminate accurate information about its services and products, and it respectfully submits that the Commission did not gather or analyze any evidence showing that a restriction upon U S WEST's speech will directly and materially advance a legitimate state interest. Absent such evidence, the restriction contravenes the test promulgated by the Supreme Court in <u>Central Hudson Gas & Electric Corp. v. Public Service Comm'n of New York</u>, 447 U.S. 557, 566 (1980), and its progeny. The Supreme Court's continued invalidation of commercial speech restrictions that fail the <u>Central Hudson</u> test is reflected in its recent decision on Monday, June 14, 1999, in <u>Greater New Orleans Broadcasting Association v.</u> United States, No. 98-387.

(8) In addition to its customer notification letter, each LEC shall provide a list of companies the customer can choose from and the companies' toll free numbers-

The order suggests that U S WEST and other LECs should have available the toll free numbers of its competitors. U S WEST, and certainly other LECs, do not actively or continuously update the call-in numbers of all of its competitors. Further, the identity of competitors, and their toll free numbers, change continuously.

3

U S WEST has amended its revised plan to reflect that, if a customer requests a carrier's toll free number, and if that number is available to the U S WEST customer representative, then it will be provided.

ADVISEMENT REGARDING CUSTOMER NOTIFICATION

U S WEST's original plan recommended that the Commission authorize the delivery of its customer notifications by June 1, 1999, in order that U S WEST could mail such notifications on June 22, 1999. At a base minimum, U S WEST needs s-ven days after Commission authorization to mail the notifications. By this pleading, U S WEST advises the Commission that it appears that July 1, 1999, will be the earliest that U S WEST can mail its customer notifications, assuming that the Commission authorizes U S WEST's form customer notification on June 22, 1999. U S WEST's revised plan reflects these dates for the Commission's approval and U S WEST's customer notification mailings.

Dated this 17th day of June, 1999.

Respectfully submitted,

Todd h. b. dy

Todd L. Lundy Senior Attorney U S WEST Communications, Inc. 1801 California, Suite 5100 Denver, CO 80202 (303) 672-2783

CERTIFICATE OF SERVICE

I hereby certify that an original and seven (7) copies of the following were filed overnight delivery on this 17th day of June, 1999, to the following:

> William Bullard, Jr., Executive Director South Dakota Public Utilities Commission 500 East Capitol Pierre, South Dakota 57501

In addition, a true and correct copy was placed in the United States mail, postage prepaid, addressed as follows:

Maria Arias-Chapleau Michel Singer AT&T Communications 1875 Lawrence St., Suite 1575 Denver, CO 80202

Philip E. Stoffregen Dickinson, Macaman, Tyler & Hagen, P.C. 1600 Hub Tower 699 Walnut St. Des Moines, 1A 50309-3986

Karen Clauson MCI Telecommunications Regulatory & Governmental Affairs 707 17th ST., Suite 3900 Denver, CO 80202 Donald A. Low Sprint Communications 8140 Ward Parkway, 5E Kansas City, MO 64114

Richard Tieszen Thomas Harmon Tieszen Law Office P. O. Box 626 Pierre, SD 57501-0626

ST Communications, Inc.

JUN. 18, 1999 3:00PM SBTC/VCI 16050522404 NO.215 P.1/2 TC99-030 LY BUTTES HORATVE NC. FAX VENTURS TO Delaine FROM: PAGES: Fann DATE: 10-18-99 PHONE: RE If you have not received legible copies or did not receirs the full transmission, please cell Janice Volak at 605-652-9224 commen Customer letter corrected as ser, our show conversation. Thanks min THE INFORMATION CONTAINED IN THIS FACSIBILE MESSAGE IS PRIVILEGED AND CONFIDENTIAL INFORMATION INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY NAMED AS RECIPIENT. IF THE READER IS NOT THE INTENDED RECIPIENT, NOTICE IS HEREBY GIVEN THAT ANY DISSEMINATION OR COPYING OF THIS COMMUNICATION IS STRICTLY PRONSHITED. IF YOU HAVE RECEIVED THIS COMMUNICATION IN ERROR PLEASE NOTIFY US IMMEDIATELY BY TELEPHONING US

COLLECT AT THE ABOVE PHONE NUMBER.

PO Bas: 157 • 218 Counterclal Ave BE • Highmore, 8D 57345 Phone: 605-658-6284 • Pas: 605-659-6404 Date:

To: All Customers of Venture Communications, Inc.

Venture Communications, Inc. is pleased to announce that effective July 22, 1999, we will make it possible for you to choose from various long distance companies for your in-state 1+ long distance aervice (intraLATA long distance service). This service includes all of your intrastate long distance calls made by dialing 1 plus the area code and local telephone number. With these changes, you will have the ability to select a long distance company for your in-state 1+ long distance service.

In conjunction with making these changes, Venture Communications, Inc. is asking all of its local exchange subscribers to choose whether they wish to retain the current long distance company providing their intraLATA 1+ long distance service or wish to select another company for such arvice.

Currently Sully Buttes Long Distance provides you with 1+ long distance service. This company will continue to provide service to you unless you select another carrier. If you do nothing, your instate1+ long distance service will remain with Sully Buttes Long Distance.

Attached is a list of long distance companies, in addition to Sully Buttes Long Distance, that have agreed to provide 1+ in-state long distance service in your area. If you wish to change your 1+ instate ('intraLATA) long distance carrier, you must directly contact the long distance company that you've chosen in order to initiate that change.

You will not be charged for making a change to your existing in-state 1+ long distance service in response to this notice. In addition, for a period of 60 days after July 22, 1999, you may decide to change your in-state 1+ long distance carrier, one time, at no charge. After September 20, 1999, you will incur a Primary Interexchange Carrier (PIC) charge of \$5.00 for changing carriers.

Customers who wish to be placed on a specific calling plan with their selected long distance company must contact the long distance carrier to set up the plan.

Should you have any questions on this matter, please call our office at 800-\$24-7282 or simply dial 811.

2

Sincerely,

VENTURE COMMUNICATIONS, INC.

Randy Houdek General Manager

Neil Schmid

From: Sent: To: Cc: Subject: Neil Schmid Friday, June 18, 1999 3:15 PM "terryn@puc.state.sd.us" billb@puc.state.sd.us' TC99-030

RECEIVED

JUN 2 1 1999

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION Elec. reid 6/18/99

10

Pland.d. Attached is a copy of FirsTel's Dialing Parity Plan which, I believe, addresses the requiremens of the April 2 Order Setting Guidelines as well as the June 15, 1999 amendment to the Order Setting Requirements for Plans.

In addition I am sending 10 copies of this plan via overnight mail.

I look forward to your comments.

Neil Schmid, Director of Regulatory Affairs FirsTel/Advanced Communications Group 2900 West 11th Street Sicust Failts, SD 57105

> voice (605) 782-2878 fax (605) 782-2958

RECEIVED

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF SOUTH DAKOTA

JUN 2 1 1999

IN THE MATTER OF THE FCC ORDER ESTABLISHING NEW DEADLINES FOR IMPLEMENTATION OF INTRALATA DIALING PARITY BY LOCAL EXCHANGE CARRIERS

) TC99-030) FIRSTEL, INC) PLAN SOUTH DAKOTA PUBLIC UTILITIES COMMISSION) INTRALATA TOLL DIALING) PLAN

Pursuant to the Order of the South Dakota Public Utilities Commission, FirsTel, Inc. hereby submits this intraLATA toll dialing plan for Commission review and approval, according to the guidelines ordered April 2, 1999, and amended June 15, 1999:

1) a description of how the LEC will offer dialing parity for each exchange and its proposed time schedule:

Currently, FirsTel provides local exchange service only as a reseller of US West services under an approved agreement on file with the South Dakota Public Utilities Commission. As a reseller of US West's Local Service, FirsTel a bility to offer dialing parity is dependent upon US West. FirsTel intends to support intraLATA dialing parity in the same manner it currently supports interLATA dialing parity in each US West exchange.

2) a proposal for timely notification of its subscribers and the methods it proposes to use to enable subscribers to select an intraLATA toll provider, including the language the LEC proposes to use in its customer notification letter. The proposals shall include notification to current customers and new customers who join the network after the implementation of dialing parity:

Within thirty days following the approval of this plan, FirsTel will notify current customers of options to select an intraLATA toll provider through a "Customer Notification Letter", which follows as Exhibit A.

Additionally, within thirty days following the approval of this plan, FirsTel will modify its Letter of Authorization (LOA) to confirm the customer's choice of provider(s) for intraLATA toll as shown in Exhibit B.

 a LEC that is not a BOC must identify the LATA with which it will associate for the purposes of providing intraLATA and interLATA toll dialing parity:

In all cases, FirsTel is associated with LATA 640, NPA 605.

 a description of how carriers will be informed of the implementation process and schedule and how carriers may participate in the process:

FirsTel will notify all long distance carriers of record in the State of South Dakota of its implementation process and schedule through a letter, as shown in Exhibit C.

5) a description of how the LEC's business office will handle requests to change carriers:

Requests to change carriers will be handled by FirsTel's Central Processing Department; Carriers must send or fax a completed PIC Change Request Form, as shown in Exhibit D.

Dated this 18 day of June, 1999.

Submitted by: Neil Schmid Director of Regulatory Affairs FirsTel, Inc. 2900 W. 11th St. Sioux Falls, SD 57104 Telephone (105) 332-3232

DRAFT Exhibit A

CUSTOMER NOTIFICATION LETTER

Month 00, 1999

TO: All Local Exchange Customers

Effective July 22, 1999, FirsTel will be able to provide intrastate, intraLATA dialing parity to you as a local exchange customer. This means that your in-state long distance calls will always be carried by your chosen carrier when you dial the number "1" (605) plus the seven digit number. Your in-state carrier is commonly known as your primary carrier or your PIC.

FirsTel does not require you to change your existing in-state long distance provider if you do not want to make a change.

Because of concerns with customers being switched to long distance providers without their consent, a practice called "slamming," federal and state laws now require that you make an affirmative choice of your in-state carrier. In order to protect you from slamming, we are attaching a new Letter of Agency (LOA). Please sign the LOA, and return it to FirsTel in the enclosed envelope. YOU MUST MAKE THIS CHOICE AND RETURN THE LOA IDEFORE ______, 1999. If yos have more than one local exchange number, you will have to designate your PIC for each number. Again, you do not have to change your existing in-state long distance provider, just affirm that provider as your choice.

Attached to the LOA is a list of the companies that are available for selection as your PIC for in-state service. If you do not wish to change your existing in-state long distance provider, check the space next to the letter A on the attached LOA.

If you do wish to change your carrier, you will need to check the space next to the letter B, and write in our telephone number(s) and your carrier of your choice fore each number. There is no charge for changing your carrier at this time. There also will be no charge for a one-time change made during the 60-day period after July 22, 1999. Changes made after the 60-day period will be subject to a charge for each number.

If you have any questions, please call our customer service department at (605) 332-3232 or (800) 605-3232. Sincerely,

FIRSTEL, INC.

Brad Van Leur VP, Business Markets DRAFT Exhibit B

Letter of Agency IntraLATA

Primary In-State Long Distance Service Carrier

I understand that I may designate one company as my primary intrastate long distance carrier when dialing an instate long distance call from my local telephone number.

Place a mark next to either A. or B. and complete as indicated:

- A. ____ I do not wish to change the current provider of my in-state long distance service.
- B. _____I do wish to change my in-state long distance carrier. See the Attached list of Eligible Long Distance Carriers in South Dakota. I designate the carrier on the following list as my primary intrastate long distance carrier for the telephone number(s) listed below.

My Telephone Number(s)	My Carrier of Choice
	where the second states of the

C. I request that my carrier be 'frozen', and that any future change of carrier must be initiated and released by me. Yes______ No ______

D. I authorize FirsTel to put into effect my choice as indicated above. This Letter of Agency shall be in effect upon its receipt and acceptance by FirsTel at its office in Sioux Falls, South Dakota. I certify that I am at least 18 years of age and that I have proper authority to sign this Letter of Agency.

Signature .	

Name (Please Pris	it)	
Telephone Numbe	x	
Mailing Address		

D R A F T Exhibit B

LOA Attackment

List of Eligible Long Distance Carriers for Providing IntrnLATA Toll Service

Carrier

Toll Free Number

the second se	the second
tention in the site of the second second	
the sector was been as in the sector of the sector was the sector of the	
the second secon	the second
the second secon	the state of the s
	and the second se
second	
the second	
The second se	strength of the second s
and the second sec	

DRAFT EXHIBIT C

Month 00, 1999

To: All Long Distance Carriers of Record in the State of South Dakota

Per the requirements of Section 251(b)(3) of the Telecommunications Act of 1996, FirsTel announces provisioning of IntraLATA and InterLATA equal access and dialing parity in the following South Dakota exchanges:

All US West Exchanges in South Dakota

FirsTel will work closely with all carriers of record expressing an interest to be a carrier of choice. If you are interested in receiving information which details ordering procedures, terms and conditions for the provision of Feature Group D and provides the required forms and time tables, please complete and return or fax the enclosed request form to:

Betty Rook Account Coordinator Manager FirsT 1, Inc. 2900 W. 11th St. Sioux Falls, SD 57104 Fax: (605) 332-8004

If you have questions, you may contact Betty at (605) 332-3232.

Sincerely.

FIRSTEL, INC.

Brad Van Leur VP, Business Markets

DRAFT EXHIBITD

PIC CHANGE REQUEST FOLM

Use this form to submit intraLATA/interLATA PIC change requests to FirsTel Account Coordinator

Carrier Name:______CIC Code:_____

Contact Name:_____Contact Telephone:_____

Fax Number:_____LOA ON FILE (Date) _____

BTN	WTN	LATA PHC	latra LATA PIC	Charge PSP to Carrier	Effective Date	Date Input
						-
				1		
		-	1			

ATTN: FIRSTEL (FAX): (605) 332-8004



Intrastate Telephone Company, Inc. 312 4th Szeet West P. O. Box 920 Clear Lake. South Dakota 57226-0920

Phone 605-874-2181 Fax 605-874-2014 Web http://itctel.com

June 18, 1999

RECEIVED

JUN 2 1 1999

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

Mr. William Bullard, Jr. Executive Director Public Utilities Commission 500 East Capitol Pierre, SD 57501

Ref: TC99-030

Dear Bill:

According to the Order dated Tuesday, June 15, 1999 each LEC is required to advise you regarding the status of intraLATA dialing parity. Interstate Telecommunications Cooperative, Inc., pre-U.S. West acquisition period, started providing intraLATA dialing parity when South Dakota Network became a reality. When the U.S. West property was purchased, Interstate Telecommuncations Cooperative, Inc. formed a subsidiary named Intrastate Telephone Company, Inc. Intrastate Telephone Company, Inc. implemented intraLATA dialing parity effective January 1, 1998 for all of its customers. Effective January 1, 1999, Intrastate Telephone Company, Inc. was merged into the parent, Interstate Telecommunications Cooperative, Inc. so any official recording of the status of intraLATA dialing parity should show only Interstate Telecommunications Cooperative, Inc. as the company name and that it does provide intraLATA dialing parity to all of its customers with with the most recent effective date of 1-1-98.

If you have any other questions please contact me.

Sincerely,

en E. Caduan

Dean E. Anderson General Manager

JUN-21-99 NON 03:09 PM MARTIN AND ASSOCIATES	FAX NO. 6059952577	P. 01
	To	199-030
Martin and Associates, Inc.		
CONSULTANTS - PROFESSIONAL ENGINEERS - COMPUTER SPECIALISTS		
		FAR
ro: Allaine		anan di san d
Company: S.D. P.U.C.		
Date/Time: 6-21-99		
Fax Number: 605 173 3809		
Number of Pages including Cover Page:	3	
From: Jan Christensen	and and a second se	
M&A Office Phone: 605-996-9646		
A&A Fax: 605-995-2577		

Comments: This will have to also be inserted into the copies -Margie nowek sent you. Thank you for your help Carrieted Ostomer Letter therebur If you have not neceived complete or legible copies, please call 605-996-9646

1515 North Sanborn Blvd. . Mitchell, SD 57301-1021

1

APPENDIX C

Date:

To: All Customers of Stockholm-Strandburg Telephone Co.

Stockholm-Strandburg Telephone Co. is pleased to announce that effective July 22, 1999, we will make it possible for you to choose from various long distance companies for your in-state 1+ long distance service (intraLATA long distance service). This service includes all of your intrastate long distance calls made by dialing 1 plus the area code and local telephone number. With these changes, you will have the ability to select a long distance company for your in-state 1+ long distance service.

In conjunction with making these changes, Stockholm-Strandburg Telephone Co. is asking all of its local exchange subscribers to choose whether they wish to retain the current long distance company providing their in-state 1+ long distance service or select another company for the service.

Currently, Express Communications d.b.a. Stockholm-Strandburg Long Distance provides your instate 1+ long distance service. This company will continue to provide service to you unless you select another carrier. If you do nothing, your in-state 1+ long distance service will remain with Stockholm-Strandburg Long Distance.

Attached is a list of long distance companies, in addition to Stockholm-Strandburg Long Distance, that have agreed to provide 1+ in-state long distance services in your area. If you wish to change your 1+ in-state (intraLATA) long distance carrier, you must directly contact the long distance company that you've chosen in order to initiate that change.

You will not be charged for making a change to your existing in-state 1+ long distance service in response to this notice. In addition, for a period of 60 days after July 22, 1999, you may decide to change your in-state 1+ long distance carrier, one time, at no charge. After September 20, 1999, you will incur a Primary Interexchange Carrier (PIC) charge of \$5.00 for changing carriers.

2

Please call our office at 605-676-2311 if you have any questions on this matter.

Sincerely,

Stockholm-Strandburg Telephone Co.

JUN-21-1999 HON 01:31 PM GRAND ELECTRIC

P. 01

TC99-030

MAIN STREET NORTH P. O. BOX 39 BISON, SOUTH DAKOTA 57620

West River COOPERATIVE TELEPHONE

COMPANY

PHONE (605) 244-5213 FAX (605) 244-7268

June 21, 1999

South Dakota Public Utilities Commission State Capitol Building Pierre, SD 57501

Dear Commissioners:

West River Cooperative Telephone Company has provided Interlata and Intralata dialing parity via centralized equal access through the South Dakota Network (SDN) switch since June 21, 1994.

Please feel free to contact me if you need additional information.

Sincerely,

Darrell D. Henderson, General Manager

DDH:gi

Post-it" Fax Note 7671	Deng/m/og light /
"Bill Bulland	From Hearlesco
CEDERSD PUC	Capithing Concernatione
Phone #	man 605 -2 V4-5211
Fail 605 -773 -360	100 605 - 244 - 725

SPLITROCK TELE C). 2001 Splirock Telecom Cooperative, Inc. P.O. Box 349 Gametson, SD 57000 E-mail inio@splirochtsLast www.splirochtsLast
From: An Smyders
Phone 605-594-3411 Fax Phone 605-594-6776
W Reply ASAP Please comment

06/21/90 BON 16:51 FAI 1 605 594 6776 SPLITROCK TELE CO.



June 21, 1999

Bill Bullard, Executive Director South Dakota Public Utilities Commission State Capitol Building 500 East Capitol Ave. Pierre, South Dakota 57501

RE: Docket TC99-030 (Implementation Plan for IntraLATA Dialing Parity)

Dear Bill:

Please accept this letter as notification that Splitrock Telecom Cooperative, Inc. currently provides IntraLATA toll dialing parity for all of our local exchange subscribers on a centralized basis at the access tandem switch of South Dakota Network, Inc.

2

Sincerely,

Don Snyders, Manager Splitrock Telecom Cooperative, Inc.

612 Third Street P.O. Box 349 Garretson, SD 57030 Phone: 605-594-3411 Fax: 605-594-6776 www.spiltrockiel.net

Michel L. Singer Attorney



June 21, 1999

.

Via Overnight Delivery

Mr. Bill Bullard Executive Director SD Public Service Commission 500 East Capital Avenue Pierre, SD 57501

RECEIVED

JUN 2 3 1999

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

Re: Implementation of Dialing Parity, Docket No. TC99-030

Dear Mr. Bullard:

Enclosed for filing on behalf of AT&T Communications of the Midwest Inc. is an original and 10 copies of AT&T's Response to U S WEST's Motion for Rehearing.

Please feel free to call me if there are any questions.

Sincerely,

Michel L. Singer 9

Enclosures

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF SOUTH DAKOTA

IN THE MATTER OF APPROVAL OF US V EST'S REVISED INTRALATA DIALING PARITY PLAN AND REQUEST FOR REHEARING AND RECONSIDERATION OF COMMISSION'S JUNE 15, 1999 ORDER

) DOCKET NO. TC 99-030

AT&T COMMENTS REGARDING U S WEST REVISED SOUTH DAKOTA INTRALATA TOLL DIALING PARITY IMPLEMENTATION PLAN AND REQUEST FOR REHEARING AND RECONSIDERATION

AT&T Communications of the Midwest, Inc. ("AT&T) submits the following comments regarding U S WEST Communications, Inc.'s ("U S WEST's") June 17, 1999 Revised IntraLATA Toll Dialing Parity Implementation Plan and Request for Rehearing and Reconsideration.

I. INTRODUCTION

The revised IntraLATA Toll Dialing Parity Implementation Plan submitted by U S WEST on June 17, 1999, includes several terms and provisions that the Commission has ruled will be addressed in a separate associated cost proceeding. AT&T requests that the Commission order U S WEST to remove these terms and provisions from its plan before the Commission approves the plan. In addition, U S WEST's Request for Rebearing and Reconsideration contains several inaccurate or misleading statements. AT&T believes that it is important for this Commission to be fully and accurately informed before it decides whether to reconsider its earlier decision.

II. IMPLEMENTATION PLAN

The following areas of U S WEST's Plan require further revision to comply with the Commission's Order of June 15, 1999:

0

1 5 4

30

-657

- US WEST proposes that participating carriers will be issued a one-time bulk bill to recover PIC change charges incurred during the 60 day waiver period. AT&T and MCIWorldCom opposed this issue in their May 6, 1999 comments filed in this docket and requested that the Commission require US WEST to recover these costs just as it proposes to recover all other costs it incurs as a result of introducing intraLATA dialing parity – through the Equal Access Network Reconfiguration Charge ("EANRC") rate element. AT&T further addressed this matter orally in the June 15, 1999 hearing. At that time, the Commission noted that this issue would be addressed and resolved in the separate proceeding that will be scheduled to review cost issues related to this docket.
- Similarly, U S WEST states, "[A]n intraLATA PIC change charge will be assessed when customers change their carrier for intraLATA services." (U S WEST revised plan, Charge Application, p. 3) The language of U S WEST's plan implies that customers will be charged for both an intraLATA PIC change and an interLATA PIC change when the two selections are made simultaneously. AT&T and MCIWorldcom opposed U S WEST's proposal for two charges in their May 6, 1999 Comments. AT&T raised this issue as well in its oral comments at the Commission's June 15, 1999 hearing. The Commission ruled that this issue, too, would be addressed and resolved in the

2

separate proceeding that will be scheduled to review cost issues relating to this docket.

0

154

.30

.658

- U S WEST continues to request that the Commission approve its recovery of costs starting on the date of implementation of dialing parity. It proposes that waived PIC change charges will occur "via the issuance of a one time bulk bill to each participating carrier" and that "An intraLATA PIC change charge will be assessed when customers change their carrier for intraLATA services." The Commission has expressed its intention to open a separate proceeding on the cost issues related to this docket. Until costs are approved by the Commission, U S WEST should not be allowed to collect charges from other carriers. Accordingly, AT&T requests that the Commission require U S WEST to remove the second and third paragraphs from the "Charge Application" section of its plan.
- U S WEST states that it will "[r]ecover implementation costs excluding those recovered via the one time bulk-bill process outlined above over a three year period and...cost projections will be subject to review annually and adjusted as appropriate to reflect any over or under recovery that may have occurred."
 (U S WEST plan, Cost Recovery, p. 4) As discussed above, the bulk-bill issue has not been resolved by the Commission. Nor are issues of the appropriate costs, a proper recovery period, or a proper review period resolved at this time. Therefore, AT&T requests that the Commission require U S WEST to remove the entire "Cost Recovery" section prior to granting approval of its plan.

3

III. REQUEST FOR REHEARING AND RECONSIDERATION

U S WEST has requested that the Commission reconsider its June 15, 1999 ruling that, "[t]he LEC may not automatically extend that freeze to the intraLATA PIC." U S WEST continues to take a position which is in direct violation of the FCC's rules that because effective on April 27, 1999. This Commission has already considered the evidence before it in this matter and correctly ruled that to allow such an extension would violate FCC Rule 64.1190. AT&T asks the Commission to reject U S WEST's request to reconsider this issue.

Moreover, U S WEST's request contains several inaccuracies. For instance, U S WEST attempts to mislead this Commission with statements such as, "South Dakota may stand alone as the only state in which consumers who have sought full slamming protection will not receive it." As stated in AT&T and MCIWorldcom's May 6 comments, many of the states that allowed U S WEST to proceed with PIC freeze extensions did so prior to the FCC's rules. In addition, those Commissions only reluctantly did so because U S WEST had led those Commissions to believe that it was technically incapable of implementing separate jurisdictional freezes.

Even more glaring is U S WEST's failure to inform the Commission that two other states have recently ruled that the freeze extension proposal does in fact violate the FCC's rules. On May 28, 1999, the Iowa Utilities Board issued an Order granting AT&T and Sprint's Petition for Declaratory Ruling regarding the extension of PIC freezes. The Board's Order, attached as Exhibit A, stated in pertinent part: The Board finds that its orders regarding PIC freeze changes and other changes in telecommunications services should be consistent with the FCC's regulations regarding verification procedures and, accordingly, the Board's order and U S WEST's dialing parity plan in Iowa must be modified to reflect the new regulation.

U S WEST's dialing parity plan, insofar as it provides for automatic extension of pre-existing interLATA PIC freezes to intraLATA service after the initial 120 days of dialing parity, is inconsistent with the new FCC regulation cited above because each such extension is the creation of a new PIC freeze after the effective date of the FCC rule.

The North Dakota Commission ruled similarly in a May 28, 1999 Order when it

stated:

[T]he FCC rules do emphasize that customers are to authorize PIC freezes for specific service, not accounts. Given this policy, we believe the most appropriate Commission action is to not allow the automatic extension of interLATA PIC freezes to the intraLATA toll business.¹

10

In another misleading argument in support of PIC freeze extensions, U S WEST

states that Nebraska dismissed a complaint filed by AT&T on U S WEST's intraLATA

freezes. In fact, AT&T and Sprint jointly filed a petition for "Investigation Regarding

The Release of All IntraLATA Toll Carrier 'Freezes' Instituted Without Notification or

Authorization" with the Nebraska Public Service Commission. The Nebraska

Commission dismissed the Petition on a procedural defect. It did not make a substantive

ruling as U S WEST implies. In fact, the Commission invited the Joint Petitioners to

refile the matter as a complaint rather than a petition.

U S WEST states that "[t]he issue is not whether U S WEST will comply with the FCC rules effective April 27, 1999; U S WEST has and will continue to do so." Through

¹ US WEST Communications, Inc. Toll Dialing Parity Application, State of North Dakota Public Service Commission, Case No. PU-314-99-225, Order on Customer Notification Proposal, dated May 28, 1999, p. 2. See Exhibit B.

this very request for reconsideration and rehearing on this subject, U S WEST demonstrates that nothing could be further from the truth. U S WEST would have this Commission believe that South Dakota customers have previously frozen their intraLATA carrier. Of course, this is not the case. Until intraLATA toll dialing parity is implemented (approximately July 22, 1999), customers will not have had the opportunity to choose their intraLATA carrier. Indeed, U S WEST has acknowledged that the PIC freezes in place for its current customers are limited to their interLATA service. In a June 4, 1999 hearing before the Colorado commission, on a jamming complaint filed by MC., AT&T, and NextLink against U S WEST, a U S WEST witness stated that PIC freezes were only applied to the interLATA portion of customers' accounts prior to the implementation of intraLATA toll dialing parity because that was the only choice customers had at the time.

Finally, U S WEST would have the Commission believe that if it is not permitted illegally to extend interLATA PIC freezes to customers' intraLATA accounts, the customer will not have any protection from slamming. There is nothing in the Commission's Order or the FCC rules to prohibit U S WEST from making PIC freezes available to customers' intraLATA carrier selections. U S WEST must merely ensure that the customer has separately authorized each jurisdiction on which it wishes to have a PIC freeze. The Commission should categorically deny U S WEST's request for reconsideration and rehearing on the issue of PIC freeze extension without the express approval of the customer.

6

Respectfully submitted this 22nd day of June, 1999.

AT&T COMMUNICATIONS OF THE MIDWEST, INC.

Maria Arias-Chapleau Michel Singer 1875 Lawrence Street, Suite 1575 Denver, CO 80202 (303) 298-6527

EXHIB	IT A	BECEIVED
STATE C	51209 D.22019 221 4	ATAT Corp. Legal - Denver
UTILITIES		OV-NETPRO SER
UNCINES	SBUARD	MESSPEG MAIL
IN RE:	2	OTHERINITIALS
AT&T COMMUNICATIONS OF THE MIDWEST, INC., AND SPRINT COMMUNICATIONS COMPANY, LP	DO	CKET NO. DRU-99-4 (SPU-98-10)

ORDER GRANTING PETITION FOR DECLARATORY RULING

(Issued May 28, 1999)

On April 30, 1999, AT&T Communications of the Midwest, Inc. (AT&T), and Sprint Communications Company, LP (Sprint), filed a petition for a declaratory ruling concerning the "Order Approving IntraLATA Dialing Parity Implementation Plan In Part and Modifying Plan In Part" issued by the Board on February 16, 1999, in <u>Re:</u> <u>U S WEST Communications, Inc.</u>, Docket No. SPU-98-10 (the Order). In the Order, the Board approved a U S WEST Communications, Inc. (U S West), plan for implementing dialing parity for intraLATA calls within Iowa. In its plan, U S West proposed to automatically extend a customer's interLATA PIC freeze to intraLATA services¹. The Board modified this aspect of U S West's plan to prohibit automatic extension of an interLATA PIC freeze to intraLATA services during the first 120 days after implementation of intraLATA dialing parity.

He'd har copy 6/1/99 PF

¹ A PIC freeze is an option a telecommunications carrier may exter 1 to its customers to designate a specific interexchange carrier as a permanent choice that may not be change without express authorization from the customer. This prevents most unauthorized changes in the customer's designated carrier.

THE AT&T/SPRINT PETITION

Sprint and AT&T argue that U S West's proposed practice of automatically

extending interLATA PIC freezes to intraLATA service would be a violation of a

recently-adopted rule of the FCC. On December 23, 1998, the FCC issued its

"Second Report And Order And Further Notice Of Proposed Rulemaking," In The

Matter Of Implementation Of The Subscriber Carrier Selection Changes Provisions

Of The Telecommunications Act Of 1996, FCC 98-334, CC Docket No. 94-129 (the

FCC Order). In the FCC Order, the FCC adopted a new rule that requires, in

pertinent part,

(c) Preferred carrier freeze procedures ... must clearly distinguish among telecommunications services (e.g., local exchange, intraLATA/intrastate toll, interLATA/interstate toll, and international toll) subject to a preferred carrier freeze. The carrier offering the [PIC] freeze must obtain separate authorization for each service for which a preferred carrier freeze is requested.

...

(d) Solicitation and imposition of preferred carrier freezes.

...

(2) No local exchange carrier shall implement a preferred carrier freeze unless the subscriber's request to impose a freeze has first been confirmed in accordance with one of the following procedures: [Description of confirmation procedures omitted.]

47 C.F.R. § 64.1190. This rule became effective on May 17, 1999, after the Board issued its order in Docket No. SPU-98-10. Sprint and AT&T submit that the FCC rules prohibit U S West from automatically extending a PIC freeze from one service

to another.

THE U S WEST RESPONSE

On May 24, 1999, U S West filed a response to the AT&T and Sprint petition for declaratory ruling. In its response, U S West makes statements which may be summarized as follows:

- U S West does not automatically appoint itself as the frozen carrier for all intraLATA calls every time a customer calls and requests an interLATA PIC freeze, as alleged by AT&T and Sprint.
- As of April 10, 1999, U S West created and implemented procedures so that customers who request a PIC freeze are asked whether they want the freeze on their interLATA account, their intraLATA account, or both, in compliance with the new FCC regulations.
- 3. As a part of its Dialing Parity Plan approved by the Board, during the first 120 days after implementation of dialing parity U S West is not automatically extending interLATA PIC freezes to intraLATA service, but a customer may specifically request and receive an intraLATA PIC freeze during this period.
- 4. As a part of its Dialing Parity Plan approved by the Board, after the initial 120day period U S West will automatically extend interLATA PIC freezes that were in existence prior to the effective date of the FCC regulations to the customer's intraLATA service, as well.

0104 .00 .000

U S West argues that the process described in Item No. 4 is permissible because the new FCC regulations should apply only to new PIC freeze requests on a forwardlooking basis. Accordingly, U S West submits that the petition submitted by AT&T and Sprint should be denied.

· 는

ANALYSIS

The Board will grant the petition for declaratory ruling. The Board finds the new FCC regulations require that a separate PIC freeze is required for each telecommunications service (local, intraLATA, interLATA, and international) beginning with the effective date of the FCC regulations². The Board also determines that extending an existing interLATA PIC free, a to a new service, such as intraLATA service, is the creation of a new PIC freeze for that customer. Accordingly, pursuant to the new FCC regulations U S West cannot automatically extend interLATA PIC freezes, regardless of when they were initially implemented, to intraLATA service without obtaining separate authorization for the new freeze. 47 C.F.R. § 64.1190.

The Board is aware that U S West's proposed automatic PIC freeze extension was approved by the Board in the Order in Docket No. SPU-98-10 approving U S West's dialing parity plan. That order was issued on February 16, 1999, well in

² The Board is aware that some of the FCC's new regulations were stayed by court order, <u>see</u> Order issued May 18, 1999, by the Court of Appeals for the District of Columbia Circuit in <u>MCIWorldcom</u>, Inc. vs. FCC. That stay does not affect the preferred carrier freeze rule, 47 C.F.R. § 64.1190, which therefore became effective on May 17, 1999.

advance of the May 17, 1999, effective date of the new FCC regulations. The Board finds that its orders regarding PIC freeze changes and other changes in telecommunications services should be consistent with the FCC's regulations regarding verification procedures and, accordingly, the Board's order and U S West's dialing parity plan in Iowa must be modified to reflect the new regulation.

U S West's dialing parity plan, insofar as it provides for automatic extension of pre-existing interLATA PIC freezes to intraLATA service after the initial 120 days of dialing parity, is inconsistent with the new FCC regulation cited above because each such extension is the creation of a new PIC freeze after the effective date of the FCC rule. The Board will invite U S West to submit a proposed modification of its dialing parity plan to correct this inconsistency, no later than June 15, 1999. If no such modification is filed by that date, the Board will enter an appropriate order in Docket No. SPU-98-10 on its own motion.

IT IS THEREFORE ORDERED:

The Petition For Declaratory Ruling filed on April 30, 1999, by AT&T Communications of the Midwest, Inc., and Sprint Communications Company, LP, is granted. The Board rules that U S West's dialing parity plan, insofar as it provides for

an automatic extension of pre-existing interLATA PIC freezes to intraLATA service after the initial 120 days of dialing parity, is inconsistent with 47 C.F.R. § 64.1190, which requires separate authorization for each PIC freeze implemented the effective date of the rule.

UTILITIES BOARD

Ste Am

ATTEST:

1 Vanto Executive Secretary

Dated at Des Moines, Iowa, this 28th day of May, 1999.



MAY 29 1999

IOWA UTILITIES BOARD

THOMAS J. VILSACK GOVERNOR SALLY J. PEDERSON LT. GOVERNOR

AT&T COMMUNICATIONS OF THE MIDWEST, INC. AND SPRINT COMMUNICATIONS COMPANY, L.P.

Docket No. DRU-99-4 (SPU-98-10)

"ORDER GRANTING PETITION FOR DECLARATORY RULING"

Issued May 28, 1999

Parties Served:

Richard W. Lozier, Jr. Belin, Lamson, Zumbach, Flynn 2000 Financial Center Des Moines, IA 50309-3989

Julie Thomas Bowles Sprint Communications Co., L.P. 8140 Ward Parkway, 5E Kansas City, MO. 64114

Max A. Phillips General Manager - Regulatory Affairs U S WEST Communications, Inc. 925 High Street 9 South 9 Des Moines, IA 50309

Philip E. Stoffregen Dickinson, Mackaman, Tyler & Hagen, P.C. 1600 Hub Tower 899 Walnut Street Des Moines, IA 50309-3986

David R. Conn, V.P. Law & Reg. Affairs McLeodUSA Telecommunications Services, Inc. McLeodUSA Technology Park 6400 C Street SW Cedar Rapids, IA 52406 William Sidney Smith Smith, Schneider, Stiles, Hudson, Maltancy, Shindler & Scalise, P.C. Tenth Floor, Equitable Bldg. Des Moines, IA 50309

Gary D. Stewart Consumer Advocate Department of Justice Consumer Advocate Division 310 Maple Street Des Moines, IA 50319-0063

CERTIFICATE

The undersigned hareby cartilies that the toregoin's document has been served upon all parties of record in this proceeding in accordance with the requirements of the rules of the Iowa Utilities Board.

28.1999 n

350 MAPLE STREET / DES MOINES, IOWA 50319-0069 / 515-281-5979 / fax 515-281-5329 http://www.state.ia.us/government/com/util/util.htm EXHIBIT B

ATAT Com L Conver

JUN 3 1999

STATE OF NORTH DAKOTA

PUBLIC SERVICE COMMISSION

	OTHER	INITIALS Q
	INTER-OF	FAX
1	ME35	President /
	OV-SaT	/ ``

U S WEST Communications, Inc. Toll Dialing Parity Application

ORDER ON CUSTOMER NOTIFICATION PROPOSAL

May 28, 1999

U S WEST Communications, Inc. (U S WE 3T) filed AN intraLATA toll dialing parity implementation plan in response to the March 19, 1999, Federal Communications Commission (FCC) order in CC Docket 96-98, FCC No. 99-54 (Order), setting forth rules for the implementation of toll dialing parity. In its implementation plan, U S WEST requested early Commission approval of the carrier notification letter and the customer notification letter, in order to complete implementation of dialing parity by July 22, 1999. On April 29, 1999, the North Dakota Public Service Commission issued a Notice of Hearing on the dialing parity plan scheduling the hearing for June 15, 1999 and providing until May 14, 1999 for written comments on U S WEST's carrier and customer notification proposals.

On May 14, 1999, written comments were received from AT&T Communications of the Midwest, Inc. (AT&T) and MCI WorldCom, Inc. (MCIW). On May 20, the Commission approved U S WEST's proposed carrier notification letter. On May 26, 1999, the Commission held an informal hearing concerning the content of U S WEST's customer notification letter.

Generally, U S WEST's proposal for customer notification is reasonable and in the public interest. However, certain aspects of U S WEST's proposal should be revised to further the goal of competitive neutrality and consumer choice. Some of these concerns were raised by AT&T and MCIW in their written comments. Some were made known to the Commission through the review of customer notification letters approved in other states.

AT&T and MCIW suggest a grace period longer than 30 days after toll dialing parity implementation for customers to change their choice of intraLATA long distance carrier without charge. We agree that 30 days is insufficient because it does not allow a sufficiently long period of time after conversion for customers to experience more than one full billing cycle during which they can exercise choice without cost. We believe 60 days is reasonable.

AT&T and MCI also raised the concept of competitive neutrality by discussing the number of times U S WEST's name is mentioned in the customer notification letter. We agree that it is not competitively neutral if U S WEST's name appears more than necessary. U S WEST's name should be mentioned only when necessary and at most 2 times. Letters approved by other states evidence that this can be accomplished.

AT&T and MCIW also question the language in U S WEST's proposed customer notification letter concerning the extension of a PIC freeze to the customer's choice of intraLATA toll carrier without an affirmative customer request for an intraLATA freeze. AT&T and MCIW assert that the Federal Communications Commission's new slamming rules prohibit U S WEST's proposal. The FCC rules do emphasize that customers are to authorize PIC freezes for specific services, not accounts. Given this policy, we believe the most appropriate Commission action is to not allow automatic extension of interLATA PIC freezes to the intraLATA toll business. We believe the local company should inform customers that they may ask their local telephone company to apply such a freeze.

Our review of the U S WEST customer notification letters approved and sent in other states revealed two provisions which we believe should be included in all customer notification letters sent by any local exchange company. These are the provision regarding the potential for customer solicitations by long distance companies via telemarketing or other methods, and the inclusion of a LATA map and description. These provisions will provide important consumer information that we believe is necessary for informed customer decisions.

Order

The Commission orders:

 The application of U S WEST Communications, Inc. for approval of its customer notification letter is GRANTED subject to the following conditions:

 The customer notification letter must be competitively neutral. A company's name may appear only when necessary and no more than 2 times. No company logo may appear on the letter. The local telephone company logo must appear on the mailing envelope.

The customer notification letter must be a separate mailing rather than a bill stuffer.

4. Customers may make and change their intraLATA carrier choice any number of times at no customer charge after the customer notification letter is mailed and through the final date of a grace period. The grace period must be a minimum of 60 days after intraLATA dialing parity is implemented. The customer notification letter must specifically indicate the final date of the grace period.

5. The customer notification letter must include a paragraph which states "In the coming months, companies that plan to offer long distance service within your LATA may contact you through telemarketing, advertising, or direct mail. The information

Order Regarding IntraLATA Toll Dialing Parity Implementation Plans Page 2 provided may help you make your choice since each company's rates, plans and policies differ."

6. The customer notification letter must include a LATA map and explanation of LATA calling areas and jurisdictions. An example explanation: "LATA is your Local Access and Transport Area. Calls that originate and terminate within the outlined portions of this map are referred to as intraLATA calls. Calls that cross these LATA boundaries are referred to as interLATA calls.

7. The customer notification letter must state: "If you wish to protect your account frem future unauthorized changes to your intraLATA long distance carrier choice, commonly referred to as a "PIC freeze", you must contact your local telephone company (phone numbers for residence ______ or business ______)." The customer notification letter may make no other reference to interexchange carrier PIC freezes.

 The customer notification letter must state: "This letter has been approved by the North Dakota Public Service Commission."

The company must submit a copy of the final version of its customer notification letter to the Commission before mailing to customers.

PUBLIC SERVICE COMMISSION

Susan E. V

Commissioner

Bruce Hagen President

Leo M. Reinbold Commissioner



STATE OF NORTH DAKOTA

PUBLIC SERVICE COMMISSION

U S WEST Communications, Inc. Toll Dialing Parity Application Case No. PU-314-99-225

AFFIDAVIT OF SERVICE BY CERTIFIED MAIL

STATE OF NORTH DAKOTA COUNTY OF BURLEIGH

Sharon Heibling deposes and says that:

she is over the age of 18 years and not a party to this action and, on the 1st day of June, 1999, she deposited in the United States Mail, Bismarck, North Dakota, four envelopes with certified postage, return receipt requested, fully prepaid, securely sealed and each containing a photocopy of:

Order

The envelopes were addressed as follows:

Michael A Bosh, Jan M Sebby P O Box 1000 Minot AD 58702-1000

Cert. No. Z129 418 592

Michel Murray MCI WorldCom Inc & MCI Telecommunications Corp 707 17th Street Ste 3600 Denver CO 80202 Cert. No. 2129 418 594 Michel L Singer AT&T Communications 1875 Lawrence St Ste 1500 Deriver CO 80202 Cert. No. Z129 418 593

Scott Macintosh U S WEST P O Box 5508 Bismarck ND 58502-5508

Cert. No. Z129 418 597

Each address shown is the respective addressee's last reasonably ascertainable post office address.

Subscribed and sworn to before me this 1st day of June, 1999.

Notary Public

SEAL

8



June 22, 1999

Mr. Raymond Vawter, Executive Secretary Department of Commerce – Utilities Division 350 Maple Street Des Moines, IA 50319-0089

REF: Docket No. SPU-99-5

Deer Mr.Vawter.

In response to the Dialing Parity Plan modifications requested by the Board, Heartland Telecommunications Company of Iowa accepts the modifications and will alter the plan to secure the Board's approval.

On page 3 under PIC Freeze, the sentence "On July 22, 1999, all frozen numbers will be frozen at the IntraLata level one hundred and twenty days after the plan goes into effect" is now stricken from the plan.

On page 7 under PIC Discute Rates, the entire provision relating to stamming dispute resolution is now deleted from the Plan.

Through this written acknowledgement of the acceptance of the modifications, Heartland understands the Dialing Parity Plan to be approved effective June 22, 1999.

1

Please call me at (507) 387-1728 with any questions.

Sincerely,

Patricia Burt Tariff Analyst Heartland Telecommunications Company of Iowa

221 E. HICKORY S

		CK FAX and
	Reparcal Crement	From: Oft Burt
T. P.O. BOX 334	605-773-3809	507-387-6813
100-782-4485 FA		507-387-1728

2001

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF SOUTH DAKOTA

IN THE MATTER OF THE FCC ORDER) ORDER APPROVING ESTABLISHING NEW DEADLINES FOR) DIALING PARITY IMPLEMENTATION OF INTRALATA DIALING) IMPLEMENTATION PLANS PARITY BY LOCAL EXCHANGE CARRIERS) TC99-030

On March 23, 1999, the Federal Communications Commission (FCC) issued an order establishing new deadlines for implementation of intraLATA dialing parity by local exchange carriers (LECs). In the Matters of Implementation of the Local Competition Provisions of the Telecommunications Act of 1996; Petition of Southwestern Bell Telephone Company, Pacific Bell, and Nevada Bell for Expedited Declaratory Ruling on Interstate IntraLATA Toll Dialing Parity or, in the Alternative, Various Other Relief, CC Docket No. 96-98, FCC 99-54 (released March 23, 1999). The order states that "[n]o later than April 22, 1999, all LECs must file intraLATA toll dialing parity plans with the state regulatory commission for each state in which the LEC provides telephone exchange service if a plan has not yet been filed with such state commission. Once a state commission has approved a plan, the LEC must implement its plan no later than 30 days after the date on which the plan is approved." Id. at ¶7. If the state commission has not acted on the plan by June 22, 1999, the LEC must file the plan with the Common Carrier Bureau of the FCC. Id.

At its March 30, 1999, meeting, the Public Utilities Commission (Commission) opened a docket in order to review intraLATA toll dialing plans and established a procedural schedule that would allow other parties to file written comment on the LECs' intraLATA toll dialing plans. No parties objected to this proposal. At its April 1, 1999, meeting, the Commission issued guidelines for LECs to follow when developing their intraLATA toll dialing plans. On the issue of cost recovery, the Commission decided that if a LEC believes that it needs cost recovery, the LEC should file for cost recovery in a separate proceeding before the Commission in accordance with FCC rules.

On April 23, 1999, the Commission faxed notice that the following companies had filed intraLATA toll dialing parity plans: Heartland Telecommunications Company of Iowa on April 20, 1999; Accent Communications, Inc. on April 20, 1999; Splitrock Properties, Inc. on April 21, 1999; Jefferson Telephone Company on April 21, 1999; Venture Communications, Inc. on April 21, 1999; Hanson County Telephone Company on April 21, 1999; Vivian Telephone Company d/b/a Golden West Communications, Inc. on April 21, 1999; Stockholm-Strandburg Telephone Co. on April 22, 1999; AT&T Communications of the Midwest, Inc. on April 22, 1999; Midco Communications on April 22, 1999; Heartland Communications, Inc. on April 22, 1999; Mobridge Telecommunications on April 22, 1999; West River Telecommunications Cooperative on April 22, 1999; Dakota Telecommunications Group, Inc., DTG Communications, Inc. on April 22, 1999; and U S WEST Communications, Inc. on April 22, 1999.

At its May 12, 1999, meeting and its June 8, 1999, meeting, the Commission approved carrier notification letters. At its June 8, 1999, meeting, the Commission also requested additional information from the parties.

At its June 15, 1999, meeting, the Commission considered whether to order any changes to the filed plans. The Commission voted to require the following changes be made to the plans:

(1) If a customer currently has an interLATA PIC freeze, the LEC may not automatically extend that freeze to the intraLATA PIC. According to FCC rules, separate authorizations must be received for each service for which a carrier freeze is requested. 47 C.F.R. § 64.1190(c). Thus, a customer's intraLATA PIC may be frozen only if the customer separately authorized the freeze in accordance with § 64.1190;

(2) Customers shall be allowed at least one intraLATA carrier PIC choice free of charge during the first 60 days following implementation;

(3) If an existing or new customer contacts the LEC to pick or change its intraLATA carrier, the LEC may not market its products or services on that same call but may answer customer initiated questions;

(4) Directory assistance calls are not required to be subject to presubscription;

(5) The Commission will allow a thirty day window for solicitation of customers prior to implementation and a LEC may wait until the date of implementation to accept intraLATA PICs;

(6) If a new customer does not indicate a preference for a carrier, the LEC must comply with 47 C.F.R. § 51.209(c) which prohibits the automatic assignment of a customer's intraLATA toll traffic;

(7) A LEC shall send notice of the availability of dialing parity regardless of whether it has received any Access Service Requests;

(8) In addition to its customer notification letter, each LEC shall provide a list of companies the customer can choose from and the companies' toll free numbers;

(9) In the customer notification letter, if the customer wants to change its existing carrier, the customer shall be told to contact the carrier it wants to change to instead of the LEC; (10) The first sentence and fourth paragraph of AT&T's customer notification letter are not competitively neutral and shall be revised or deleted;

(11) Each plan shall address the issue of payphones.

Each LEC that filed a plan that did not meet these requirements was required to refile a new plan consistent with these requirements by Friday, June 18, 1999. In addition, the Commission denied U S WEST's request to reclassify its toll services from emerging competitive to fully competitive, finding that in order to reclassify a service, the procedures as outlined in SDCL 49-31-3.2 must be followed. The Commission further ordered the LECs that have failed to notify the Commission of whether they currently provide intraLATA dialing parity to submit written notification prior to June 22, 1999.

The following companies submitted revised plans at various times throughout the process: AT&T Communications of the Midwest, Inc.; Accent Communications, Inc.; Dakota Telecommunications Group, Inc., DTG Community Telephone, Inc., and Dakota Telecom, Inc.; Hanson Communications, Inc. dba McCook Telecom; Hanson County Telephone Company; Heartland Communications, Inc.; Heartland Telecommunications Company of Iowa; Jefferson Telephone Company; Midco Communications; Mobridge Telecommunications Co.; Splitrock Properties, Inc.; Stateline Telecommunications, Inc.; Stockholm-Strandburg Telephone Co.; U S WEST Communications, Inc.; Venture Communications, Inc.; Vivian Telephone Company d.b.a. Golden West Communications, Inc.; and West River Telecommunications Cooperative. FirsTel, Inc. filed an intraLATA toll dialing plan on June 18, 1999.

On June 18, 1999, U S WEST filed a Motion for Rehearing and Reconsideration, Submission of Revised Dialing Parity Plan Under Reservations of Rights, and Advisement Regarding Customer Notification. On June 18, 1999, AT&T filed a Request for Approval of Amended Dialing Parity Implementation Plan and Request for Waiver.

At its June 22, 1999, meeting, the Commission considered this matter. The Commission has jurisdiction over this matter pursuant to SDCL 49-31-81 and the Federal Telecommunications Act of 1996, specifically 47 U.S.C. §§ 251 and 252. The Commission first voted unanimously to reconsider the three issues as requested by U S WEST. On rehearing, the Commission took comments on the three issues as presented by U S WEST which concerned Commission ordered requirements one, three, and eight. Requirement one stated that a customer's intraLATA PIC may only be frozen if the customer separately authorized the freeze in accordance with 47 C.F.R. § 64.1190. U S WEST stated that this prohibition is not in the public interest. The Commission unanimously voted to deny U S WEST's request to change this requirement. The FCC rule clearly requires a separate authorization for an intraLATA PIC freeze.

Requirement three stated that "[i]f an existing or new customer contacts the LEC to pick or change its intraLATA carrier, the LEC may not market its products or services on that same call but may answer customer initiated questions." After listening to comments from the parties, the Commission unanimously voted to deny U S WEST's request to change this requirement. The Commission finds that this requirement is consistent with U S WEST's dialing parity plan filed on April 22, 1999. In that plan under the heading "Business Practices New Customers," U S WEST stated that if the customer requests "information relative to U S WEST toll products and services, U S WEST will respond to the customer's request." The Commission finds that requirement three allows U S WEST to respond to customer requests for additional information concerning the LEC's products and services.

Requirement eight states that "[i]n addition to its customer notification letter, each LEC shall provide a list of companies the customer can choose from and the companies' toll free numbers." After listening to comments, the Commissioners unanimously voted to clarify the requirement by replacing the words "in addition to" with "along with." This change is to clarify that the requirement for toll free numbers only applies to the attachment to the customer notification letter that must contain the list of companies the customer can choose from.

AT&T requested a waiver of requirement six which states that "[i]f a new customer does not indicate a preference for a carrier, the LEC must comply with 47 C.F.R. § 51.209(c) which prohibits the automatic assignment of a customer's intraLATA toll traffic." AT&T requested a waiver because it is unable to technically comply until early 2000. The Commission voted unanimously to deny the waiver, finding that the FCC would be the appropriate regulatory agency to consider the waiver since it is an FCC rule.

The Commission then considered whether to grant approval of the following dialing parity implementation plans: AT&T Communications of the Midwest, Inc.; Accent Communications, Inc.; Dakota Telecommunications Group, Inc., DTG Community Telephone, Inc., and Dakota Telecom, Inc.; FirsTel, Inc.; Hanson Communications, Inc. dba McCook Telecom; Hanson County Telephone Company; Heartland Communications, Inc.; Heartland Telecommunications Company of Iowa; Jefferson Telephone Company; Midco Communications; Mobridge Telecommunications Co.; Splitrock Properties, Inc.; Stateline Telecommunications, Inc.; Stockholm-Strandburg Telephone Co.; U S WEST Communications, Inc.; Venture Communications, Inc.; Vivian Telephone Company d.b.a. Golden West Communications, Inc.; West River Telecommunications Cooperative.

Commission Staff recommended that the following plans be approved subject to the companies filing revisions to address the following issues:

(1) Dakota Telecommunications Group, Inc., DTG Community Telephone, Inc., and Dakota Telecom, Inc. should confirm that their customer notification letters will include the toll free numbers of the listed companies the customer can choose from;

(2) FirsTel, Inc. should file a revised plan showing compliance with requirements six, seven, eight, nine, and eleven as ordered by the Commission and a list of the exchanges it serves and corresponding NXX prefixes; (3) Midco Communications should file a revised customer notification letter with consistent references to the name of the company and also file a list of the exchanges it serves and corresponding NXX prefixes.

The Commission voted unanimously to approve the plans subject to Staff's recommendations as listed above. In addition, the Commission finds that since the Commission decided that cost recovery issues will be decided in separate dockets, approval of any plan does not constitute approval of any proposed rates or proposed recovery of costs associated with the provisioning of intraLATA dialing parity.

It is therefore

ORDERED, that U S WEST's request to charge requirements one and three is denied and requirement eight is clarified as stated above; and it is

FURTHER ORDERED, that AT&T's request for waiver of requirement six is denied; and it is

FURTHER ORDERED, that the Commission approves the dialing parity implementation plans of the companies listed above subject to Staff's recommendations on three of the plans.

Dated at Pierre, South Dakota, this 22nd day of June, 1999.

CERTIFICATE OF SERVICE The undersigned hereby certifies that this document has been served today upon all parties of record in this docket, as listed on the docket service list, by facsimile or by first class mail, in properly addre with charges prepaid thereon (OFFICIAL SEAL)

BY ORDER OF THE COMMISSION:

JAMES A. BURG, Chairman

PAM NELSON, Commissioner

LASKA SCHOENFELDER, Commissioner

TC99-030



West River

COOPERATIVE TELEPHONE COMPANY

MAIN STREET NORTH P. O. BOX 39 BISON, SOUTH DAKOTA 57620

PHONE (605) 244-5213 FAX (605) 244-7288

June 21, 1999

RECEIVED

JUN 2 3 1999

South Dakota Public Utilities Commission State Capitol Building Pierre, SD 57501

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

Dear Commissioners:

West River Cooperative Telephone Company has provided Interlata and Intralata dialing parity via centralized equal access through the South Dakota Network (SDN) switch since June 21, 1994.

Please feel free to contact me if you need additional information.

Sincerely,

Darrell D. Henderson, General Manager

Darren D. Henderson, General Man

DDH:gj

TC99-030



GTE Service Corporation

444 Cedar Street Suite 1018 St. Paul, MN 55101

June 22, 1999

Mr. William Bullard Jr.

Executive Secretary

RECEIVED

JUN 2 5 1999

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

South Dakota Public Utilities Commission State Capitol 500 Jast Capitol Pierre, SD 57501-5070

RE: IntraLATA Toll Dialing Parity

Dear Mr. Bullard:

Per the PUC Staff's recommendation of May 7, 1999, Contel of Minnesota, Inc. d/b/a GTE Minnesota respectfully informs the Commission that GTE began offering intraLATA toll dialing parity in South Dakota on 2/15/96.

If you have any questions, please contact Robert Cook at 651-224-3546.

Sincerely

D.M. Anderson State Director-External Affairs

Copy: R. Cook M. Bollinger M. Polman

A part of GTE Corporation



JUN 28 100) SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

Sioux Falls. South Dakota 57104-6824 605/334-1200 • Fax: 605/339-4419

June 25, 1999

Mr. Bill Bullard Executive Director South Dakota Public Utilities Commission 500 East Capitol Avenue Pierre, SD 57501

RE: TC99-030 - Order Approving Dialing Parity Imp ementation Plans

Dear Bill:

Please find enclosed the amended Dialing Parity Plan for Midcontinent Communications. We have made the revisions ordered by the Commission on Wednesday, June 23, including:

- revising the "Customer Notification Letter" with consistent references to the company name, and
- 2. adding a list of NPA-NXX prefixes in exchanges served in section 1 of the plan.

Unless I hear otherwise from staff, I will assume that, with these changes, our plan is approved and we can begin the process of carrier notification.

As always, thank you for your assistance in this matter.

Best regards.

NIX SO

Sincerely, Midcontinent Communications

W. Tom Simmons Vice President Commercial Services



RECEIVED

JUN 28 1999

BEFORE THE PUBLIC UTILITIES COMMISSISON OF THE STATE OF SOUTH DAKOTA

)

)

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE FCC ORDER ESTABLISHING NEW DEADLINES FOR IMPLEMENTATION OF INTRALATA DIALING PARITY BY LOCAL EXCHANGE CARRIERS

TC99-030 MIDCO COMMUNICATIONS INTRALATA TOLL DIALING PLAN

Pursuant to the Order of the South Dakota Public Utilities Commission, Midcontinent Communications hereby submits this intraLATA toll dialing plan for Commission review and approval, according to the guidelines ordered April 2, 1999:

1) a description of how the LEC will offer dialing parity for each

exchange and its proposed time schedule;

Currently, Midcontinent Communications provides local exchange service only as a reseller of US West services under an approved agreement on file with the South Dakota Public Utilities Commission. Midcontinent's ability to offer dialing parity depends in large part on the dialing parity plan developed by US West. Subject to coordination with the US West plan, Midcontinent intends to support intraLATA dialing parity in the same manner it currently supports interLATA dialing parity in each US West exchange.

Midcontinent Communications also intends to provide facilities based local service in selected US West exchanges, including the following NPA-NXX prefixes:

605-274	605-252	605-241	605-223	605-224
605-225	605-226	605-229	605-232	605-235
605-256	605-269	605-273	605-322	605-330
605-331	605-332	605-333	605-334	605-335
605-336	605-338	605-339	605-341	605-342

605-343	605-347	605-348	605-352	605-353
605-355	605-356	605-357	605-361	605-362
605-367	605-368	605-254	605-371	605-373
605-377	605-378	605-385	605-388	605-393
605-394	605-399	605-423	605-432	605-444
605-472	605-524	605-534	605-546	605-555
605-574	605-575	605-578	605-584	605-599
605-622	605-624	605-626	605-627	605-642
605-644	605-655	605-665	605-668	605-677
605-698	605-731	605-734	605-737	605-743
605-773	605-782	605-787	605-847	605-853
605-854	605-862	605-865	605-877	605-882
605-884	605-886	605-892	605-923	605-945
605-978	605-983	605-987	605-988	605-995
605-996	605-997	605-241	605-321	605-322
605-330	605-331	605-332	605-333	605-334
605-335	605-336	605-338	605-339	605-351
605-357	605-359	605-360	605-361	605-362
605-366	605-367	605-368	605-370	605-371
605-373	605-376	605-444	605-575	605-728
605-731	605-743	605-746	605-782	605-929
605-940	605-941	605-965	605-978	605-988

The details of providing that service is contained in an interconnection agreement between Midcontinent Communications, Inc. and US West, Inc., pending approval of the South Dakota Public Utilities Commission (Docket TC99-023). Section 11 of the Agreement addresses dialing parity, offering the full two-PIC option in conformance with Section 271 of the Telecommunications Act. The Agreement also guarantees that for resale, or when Port/Switching Services are provided by US West, any end-user will be able to access the Midcontinent network for services using the same dialing protocol that the end user would use to access the same service on the US West network. 2) a proposal for timely notification of its subscribers and the methods it proposes to use to enable subscribers to select an intraLATA toll provider, including the language the LEC proposes to use in its customer notification letter. The proposals shall include notification to current customers and new customers who join the network after the implementation of dialing parity;

Within thirty days following the approval of this plan, Midcontinent Communications will notify current customers, including payphone service providers, of options to select an intraLATA toll provider through a "Customer Notification Letter". Customers who choose a carrier other than their current carrier will be advised to contact the carrier they've chosen to initiate the change. Should customers contact Midcontinent Communications to initiate a change, Midcontinent will not market its products or services. Midcontinent will answer customer initiated questions, and attempt to explain the process and options. Customers choosing to stay with their current intraLATA carrier will not have to take any action. The "Customer Notification Letter" will include a list of intraLATA carriers in addition to the existing 1+ carrier that have indicated a desire to participate in the intraLATA toll presubscription process. The specific language of the "Customer Notification Letter" follows as Exhibit A. Additionally, within thirty days following the approval of this plan, Midcontinent Communications will modify its Letter of Authorization (LOA) to confirm the customers choice of providers for: 1) Local exchange service, 2) IntraLATA toll, and 3) InterLATA toll service. The specific language of follows as Exhibit B.

2) a proposal for timely notification of its subscribers and the methods it proposes to use to enable subscribers to select an intraLATA toll provider, including the language the LEC proposes to use in its customer notification letter. The proposals shall include notification to current customers and new customers who join the network after the implementation of dialing parity;

Within thirty days following the approval of this plan, Midcontinent Communications will notify current customers, including payphone service providers, of options to select an intraLATA toll provider through a "Customer Notification Letter". Customers who choose a carrier othu: than their current carrier will be advised to contact the carrier they've chosen to initiate the change. Should customers contact Midcontinent Communications to initiate a change, Midcontinent will not market its products or services. Midcontinent will answer customer initiated questions, and attempt to explain the process and options. Customers choosing to stay with their current intraLATA carrier will not have to take any action. The "Customer Notification Letter" will include a list of intraLATA carriers in addition to the existing 1+ carrier that have indicated a desire to participate in the intraLATA toll presubscription process. The specific language of the "Customer Notification Letter" follows as Exhibit A. Additionally, within thirty days following the approval of this plan, Midcontinent Communications will modify its Letter of Authorization (LOA) to confirm the customers choice of providers for: 1) Local exchange service, 2) IntraLATA toll, and 3) InterLATA toll service. The specific language of follows as Exhibit B.

Customers will be advised that they can change their intraLATA 1+ carrier during the first 60 days following the intraLATA toll dialing parity implementation. presubscription process without charge. After that date, \$5.00 per change will be charged. If a customer currently has an interLATA PIC freeze, that freeze will only be extended to the intraLATA PIC as a result of a separate authorization for the intraLATA PIC freeze. If the customer contacts Midcontinent Communications

 a LEC that is not a BOC must identify the LATA with which it will associate for the purposes of providing intraLATA and interLATA toll dialing parity;

in all cases, Midcontinent Communications is associated with LATA 640, NPA 605.

4) a description of how carriers will be informed of the implementation process and schedule and how carriers may participate in the process; Midcontinent Communications will notify all long distance carriers of record in the State of South Dakota of its implementation process and schedule through a letter. Carriers need not request specific Access Service Requests (ASR's) to be notified. The specific language of the letter follows as Exhibit C.

 a description of how the LEC's business office will handle requests to change carriers. Requests to change carriers will be handled by the central processing department, Carriers must send or fax a completed PIC Change Request Form. A sample follows as Exhibit D.

Originally submitted April 21, 1999.

Amended June 18, 1999

Respectfully submitted,

W. Tom Simmons Vice President & General Manager Midcontinent Communications 410 South Phillips Avenue Sioux Falls, SD 57104 Telephone (605) 334-1200

Exhibit A

Customer Notification Letter

Thank you for choosing Midcontinent Communications as your provider for local exchange telephone services. Effective July 22, 1999, we are offering you the opportunity to select in-state 1+ long distance service from various long distance companies. Currently, your in-state long distance carrier is Midcontinent Communications. We urge you to choose an instate provider as soon as possible. If you do nothing, your in-state long distance service cannot be accomplished by dialing 1+. Your choice may include Midcontinent Communications, or any other long distance carrier of record in the state of South Dakota who have indicated a desire to be a carrier of choice on our IntraLATA PIC list. Those carriers who have agreed to provide 1+ instate long distance service are listed on the following "Carriers of Record" notification.

If you wish to make a change in carriers, you must contact the long distance company that you've chosen to order their service. They will contact us to complete the change.

Should you choose to make a change of in-state long distance carriers between now and September 22, 1999, there will be no charges for the change. After September 22, 1999, a \$5.00 charge per change will appear on your bill.

If you have questions, please do not hesitate to call our customer service department at 605-334-1200 or 1-800-888-1300.

Sincerely, Midcontinent Communications

W. Tom Simmons Vice President & General Manager Commercial Services

CARRIERS OF RECORD

Following is a list of carriers who have indicated an interest in offering intraLATA 1+ in-state long distance service. If you wish to change your intraLATA long distance carrier, please contact the carrier at the number listed to initiate the change.

AAA Telecommunications	1-800-555-4567
BBB Telecommunications	1-800-555-5678
CCC Telecommunications	1-800-555-6789
Midcontinent Communications	1-800-888-1300
PPP Telecommunications	1-800-555-7891
SSS Telecommunications	1-800-555-1234

EXHIBIT B

Date:_____

Name (Company)

Address:

City, State, Zip:

Phone:

Midcontinent Communications, Inc. 410 South Phillips Avenue Sioux Falls, SD 57104-6824

Dear Midcontinent Communications:

This letter authorizes Midcontinent Communications, Inc., to act as our local exchange carrie . I understand that we have a choice in selecting providers of intraLATA (in state long distance) and interLATA (out of state long distance) services. The choice may include Midcontinent Communications, or any other long distance carrier of record in the state of South Dakota who have indicated a desire to be a carrier of choice on the IntraLATA/InterLATA PIC lists.

My IntraLATA (in state long distance) provider is:

My InterLATA (out of state long distance) provider is:

By

Ву_____

Date:_____

Date:_____

We authorize Midcontinent to make appropriate changes for all lines at the address listed above, and understand and agree to any charges that may be incurred for changing lines and PIC's to Midcontinent or other choices indicated above.

Sincerely,

Date:

EXHIBIT C

r

Month 00, 1999

To: All Long Distance Carriers of Record In the State of South Dakota

Midcontinent Communications announces provisioning of IntraLATA equal access and dialing parity in the following South Dakota exchanges:

ALL US WEST EXCHANGES

Midcontinent Communications will work closely with all carriers of record expressing an interest to be a carrier of choice. If you are interested in receiving a copy of our manual, which details ordering procedures, terms and condition in for the provision of Feature Group D, Switched Access Service, and provides the required forms and time tables, please complete and return or fax the enclosed request form to:

Sharon Stettnichs Manager – Central Processing Midcontinent Communications 410 South Phillips Avenue Sioux Falls, SD 57104-6824 Fax: (605) 357-5423

If you have questions, you may contact Sharon Stettnichs at (605) 334-1200.

Sincerely, Midcontinent Communications

W. Tom Simmons Vice President & General Manager



REQUEST FORM IntraLATA/interLATA Equal / :cess and SD Dialing Parity Manual

To: Sharon Stettnichs Manager – Central Processing Midcontinent Communications, Inc. 410 South Phillips Avenue Sioux Falls, SD 57104-6824 Phone: (605) 334-1200 Fax: (605) 357-5423

Sharon:

Please send us your manual for intraLATA equal access and dialing parity with Midcontinent Communications.

Company Name:	
Contact Name:	
Address:	
City, State, Zip:	
Telephone Number:	
Fax Number:	
e-mail:	



EXHIBIT D

PIC CHANGE REQUEST FORM

Use this form to submit intraLATA/interLATA PIC change requests to Midcontinent Communications Central Processing.

Carrier Name: CIC Code:

Contact Name:

Contact Telephone:

Fax Number:

LOA ON FILE (Date)

剧会物	wit.	LATA	Intra LATA PIC	Charge PSP to Carrier	Effective Date	Date Input
		-				

ATTN: MIDCO CENTRAL PROCESSING (FAX): (605) 357-5423

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF SOUTH DAKOTA

IN THE MATTER OF THE FCC ORDER ESTABLISHING NEW DEADLINES FOR IMPLEMENTATION OF INTRALATA DIALING PARITY BY LOCAL EXCHANGE CARRIERS

) TC99-030) FIRSTEL, INC) INTRALATA TOLL DIALING) PLAN SOUTH DAKOTA PUBLIC UTILITIES COMMISSION) INTRALATA TOLL DIALING

Pursuant to the Order of the South Dakota Public Utilities Commission, FirsTel, Inc. hereby submits this intraLATA toll dialing plan for Commission review and approval, according to the guidelines ordered April 2, 1999, and amended June 15, 1999:

1) a description of how the LEC will offer dialing parity for each exchange and its proposed time schedule:

Currently, FirsTel provides local exchange service only as a reseller of US West services under an approved agreement on file with the South Dakota Public Utilities Commission. As a reseller of US West's Local Service, FirsTel intends to support intraLATA dialing parity in the same manner it currently supports interLATA dialing parity in each US West exchange.

Schedule of Events:

Send Carrier Letter (Exhibit C & D)	July 6th
Carrier Response Due	July 19th
Customer Notification (Exhibit A & B)	July 26th
Customer Response Due	August 9th
IntraLATA Dialing Implementation	August 23"
End of 60 day Grace period	October 22nd
	Customer Notification (Exhibit A & B) Customer Response Due IntraLATA Dialing Implementation

2) a proposal for timely notification of its subscribers and the methods it proposes to use to enable subscribers to select an intraLATA toll provider, including the language the LEC proposes to use in its customer notification letter. The proposals shall include notification to current customers and new customers who join the network after the implementation of dialing parity:

Within thirty days following the approval of this plan, FirsTel will notify current customers of options to select an intraLATA toll provider through a "Customer Notification Letter", which follows as Exhibit A.

Additionally, within thirty days following the approval of this plan, FirsTel will modify its Letter of Authorization (LOA) to confirm the customer's choice of provider(s) for intraLATA toll as shown in Exhibits B and C.

 a LEC that is not a BOC must identify the LATA with which it will associate for the purposes of providing intraLATA and interLATA toll dialing parity:

In all cases, Firs'fel is associated with LATA 640, NPA 605.

 a description of how carriers will be informed of the implementation process and schedule and how carriers may participate in the process:

FirsTel will notify all long distance carriers of record in the State of South Dakota of its implementation process and schedule through a letter, as shown in Exhibits D, E, F, and G.

5) a description of how the LEC's business office will handle requests to change carriers:

Requests to change carriers will be handled by FirsTel's Central Processing Department; Carriers must send or fax a completed PIC Change Request Form, as shown in Exhibit G.

RECEIVED

JUL 0 1 1999

0

154

30

.694

THE FOLLOWING ITEMS ARE CHANGES ORDERED DURING THE COMMISSIONS JUNE 15, 1999 MEETING, AND the Commission Staff recommended that the FirsTel plan be approved subject to the following issues:

"(2) FirsTel, Inc. should file a revised plan showing compliance with requirements six, seven, eight, nine and eleven as ordered by the Commission and a list of exchanges it servers and corresponding NXX prefixes":

6) if a new customer does not indicate a preference for a carrier, 'se LEC must comply with 47 CFR 51.209(c) which prohibits the automatic assignment of a customer's intraLATA toll traffic:

FirsTel will not automatically assign a customer's intraLATA toll traffic to itself or a subsidiary. FirsTel will follow the FCC or State rules on assignment of traffic for which an LOA has not been returned to FirsTel.

 a LEC shall send notice of the availability of dialing parity regardless of whether it has received any Access Service Requests:

FirsTel shall send notices to all Long Distance Carriers of record as indicated in #4 above.

8) in addition to its customer notification letter, each LEC shall provide a list of companies the customer can choose from and the companies' toll free numbers:

FirsTel shall comply with this request by providing a list of interested eligible carriers with toll free numbers as shown in the attached Exhibit C. The carriers listed will be those who return the IntraLATA Equal Access Participating Carrier Form shown in exhibit F. These carriers will be listed in random order.

9) in the customer notification letter, if the customer wants to change its existing carrier, the customer shall be told to contact the carrier it wants to change to, instead of the LEC:

FirsTel has modified its customer notification letter accordingly (Exhibit A).

10) intentionally omitted.

11) each plan shall address the issue of payphones:

At this time, FirsTel has no payphone providers under its Local Exchange Service. FirsTel will provide intraLATA access to all of its future payphone customers.

(furnish) a list of the exchanges it serves and corresponding NXX prefixes:

This listing is furnished as shown in Exhibit E and will be attached to the carrier letter Exhibit D.

Dated this 30th day of June, 1999.

Submitted by: Neil Schmid Director of Regulatory Affairs FirsTel, Inc. 2900 W. 11th St. Sioux Falls, SD 57104 Telephone (605) 332-3232

DRAFT Exhibit A

CUSTOMER NOTIFICATION LETTER

Month xx, 1999

01

54 .30

· 00 00

TO: All Local Exchange Customers

Effective August 28, 1999, FirsTel will be able to provide intrastate, intraLATA dialing parity to you as a local exchange customer. This means that your in-state long distance calls will always be carried by your chosen carrier by dialing 1 + 605 and the seven digit number. Your in-state carrier is commonly known as your primary carrier or PIC.

FirsTel does not require you to change your existing in-state long distance provider if you do not want to make a change at this time.

As a result of long distance companies switching customers without their coasent, a practice called "slamming," federal and state laws now require that you make an affirmative choice of your in-state long distance carrier. In order to protect you from slamming, we are attaching a new Letter of Agency (LOA). Please sign the LOA, and return it to FirsTel in the enclosed envelope. YOU MUST MAKE THIS CHOICE AND RETURN THE LOA BEFORE August 9, 1999. If you have more than one local exchange number, you will have to designate your PIC for each number.

Attached to the LOA is a list of the companies that are available for selection as your PIC for in-state service. If you do not wish to change your existing in-state long distance provider, check the space next to the letter A on the attached LOA.

If you do wish to change your carrier, you will need to check the space next to the letter B, and contact your choice of Long Distance IntraLATA carrier directly.

There is no charge for changing your carrier at this time. Also, there will be no charge for a one-time change made during the 60-day period after August 28, 1999, however, changes made after the 60-day period will be subject to a charge for each number.

If you are an existing FirsTel inter-state long distance customer, and have dialing equipment, the need for this equipment will be eliminated, except in cases where dialers are used for billing codes or speed dialing.

If you have any questions, please call our customer service department at (605) 332-3232 or (800) 605-3232. Sincerely,

FIRSTEL, INC.

Brad Van Leur VP, Business Markets DRAFTExhibit B

Letter of Agency IntraLATA

Primary In-State Long Distance Service Carrier

I understand that I may designate one company as my primary intrastate long distance carrier when dialing an instate long distance call from my local telephone number.

Place a mark next to either A. or B. or C. and complete as indicated:

- A. _____I do not wish to change the current provider of my in-state long distance service.
- E. ____I do wish to change my in-state long distance carrier. See the Attached list of Eligible Long Distance Carriers in South Dakota. I will designate the carrier on the following list as my primary intrastate long distance carrier for the telephone number(s) by contacting the carrier directly.

C. ____ I wish to select FirsTel as my Long Distance IntraLATA carrier.

- D. I request that my carrier be 'frozen', and that any future change of carrier must be initiated and released by me. Yes______ No ______
- E. I authorize FirsTel to put into effect my choice as indicated above. This Letter of Agency shall be in effect upon its receipt and acceptance by FirsTel at its office in Sioux Falls, South Dakota. I certify that I am at least 18 years of age and that I have proper authority to sign this Letter of Agency.

Signature		23.0		220
Date	a de la compañía de l			

Name (Please Print)	
Telephone Number	
Mailing Address	
ALCONTRACTOR AND A MARKET AND A MARKET	

DRAFT Exhibit C

LOA Attachment

List of Eligible Long Distance Carriers for Providing IntraLATA Toll Service

Carrier	Residential Toll Free Number	Business Toll Free Number
	And the second s	
and the second state of th	where the second s	

DRAFT EXHIBIT D

June 30, 1999

To: All Long Distance Carriers of Record in the State of South Dakota

RE: 1+ INTRALATA IMPLEMENTATION

RESPONSE REQUIRED BY July 19, 1999

Per the requirements of Section 251(b)(3) of the Telecommunications Act of 1996, FirsTel announces provisioning of IntraLATA and InterLATA equal access and dialing parity in the following South Dakota exchanges:

All US West Exchanges in South Dakota. See attached listing of Exchanges for 605-NXX served by FirsTel.

You must submit the attached "IntraLATA Equal Access Participating Carrier" form and be a registered carrier in Soura Dakota if you wish to be included in FirsTel's customer notification mailing. The form must be faxed to FirsTel and received by the close of the business day on July 19, 1999. If your company utilizes more than one CIC code, you will be listed only once on the customer notification materials.

FirsTel will work closely with all carriers of record expressing an interest to be a carrier of choice. If you are interested in receiving information which details ordering procedures, and terms and conditions for the provision of Feature Group D service please contact:

Betty Rook Account Coordinator Manager FirsTel, Inc. 2900 W. 11th St. Sioux Falls, SD 57104 Fax: (605) 332-8004

You may use the attached PIC Change Request Form to convert your customers to your long distance network.

If you have questions, you may contact Betty at (605) 332-3232.

Sincerely,

FIRSTEL, INC.

Brad Van Leur VP, Business Markets

DRAFT EXHIBITE

FirsTel Local Exchange Areas in South Dakota : Lata 640, NPA 605

a real real real real real real real rea	: Lata 0%0, NFA 000					
		nar solar Harris				
225	ABERDEEN	SD	393	RAPID CITY	SD	
226	ABERDEEN	SD	394	RAPID CITY	ISD	
229	ABERDEEN	SD	399	RAPID CITY	SD	
377	ABERDEEN	SD	787	RAPID CITY	SD	
622	ABERDEEN	SD	877	RAPID CITY	SD	
626	ABERDEEN	SD	923	RAPID CITY	SD	
983	ARLINGTON	SD	472	Contraction of the local division of the loc	SD	
892	BELLEFORCH	SD	322	SIOUX FLS	SD	
987	CANTON	SD	330	SIOUX FLS	SD	
599	CAVOUR	SD	331	SIOUX FLS	SD	
734	CHAMBERLAN	SD	332	SIOUX FLS	SD	
534	COLMAN	SD	333	SIOUX FLS	SD	
854	DE SMET	SD	334	Contraction of the local diversion of the loc	SD	
578	DEADWOOD	SD	335	SIOUX FLS	SD	
356	ELK POINT	SD	336	SIOUX FLS	SD	
997	FLANDREAU	SD	338	SIOUX FLS	SD	
223	FORTPIERRE	SD	339	SIOUX FLS	SD	
743	HARISBGTEA	SD	357	SIOUX FLS	SD	
574	HILL CITY	SD	361	SIOUX FLS	SD	
352	HURON	SD	362	SIOUX FLS	SD	
353	HURON	SD	367	SIOUX FLS	SD	
548	IROQUOIS	SD	371	SIOUX FLS	SD	
584	LEAD	SD	373	SIOUX FLS	SD	
584	LEAD	SD	444	SIOUX FLS	SD	
584	LEAD	SD	575	SIOUX FLS	SD	
847	LK PRESTON	SD	782	SIOUX FLS	SD	
256	MADISON	SD	978	SIOUX FLS	SD	
432	MILBANK	SD	988	SIOUX FLS	SD	
853	MILLER	SD	698	SISSETON	SD	
995	MITCHELL	SD	642	SPEARFISH	SD	
996	MITCHELL	SD	644	SPEARFISH	SD	
224	PIERRE	SD	347	STURGIS	SD	
773	PIERRE	SD	368	TEA	SD	
945	PIERRE	SD	624	VERMILLION	SD	
341	RAPID CITY	SD	677	VERMILLION	SD	
342	RAPID CITY	SD	627	VOLGA	SD	
343	RAPID CITY	SD	882	WATERTOWN	SD	
348	RAPID CITY	SD	884	WATERTOWN	SD	
355	RAPID CITY	SD	886	WATERTOWN	SD	
385	RAPID CITY	SD	269	WHITEWOOD	SD	
388	RAPID CITY	SD	665	YANKTON	SD	
393	RAPID CITY	SD	668	YANKTON	SD	

DRAFTENHENTF

FilkSTEL_ENC. 2900 W 11° St. Sioux Falls, SD 57744 (605) 332-3232 (605) 332-8004 FAX

IntraLATA Equal Access Participating Carrier Form

If you wish to participate in intraLATA equal access in FirsTel's service territory, this form must be completed and returned on or before July 19, 1999.

Please submit a separate form for each CIC code.

Four Digit CIC:

Carrier Information:

Name:

Address:

Name as you wish it to appear on customer notification material (if different than above):

Toll Free Number for Residential Customers:

Toll Free Number for Business Customers:

Contact Person:

Name:	10-10 Contraction of the second s
Title:	Manager and the second s
Telephone:	
FAX:	

PLEASE RETURN COMPLETE FORM TO.

Betty Rook Account Coordinator Manager FirsTel, Inc. 2900 W. 11th St. Sioux Falls, SD 57104 Fax: (605) 332-8004

DRAFT EXHIBITG

PIC CHANGE REQUEST FORM

Use this form to submit intraLATA/interLATA PIC change requests to FirsTel Account Coordinator

Carrier Name:	CIC Code:

Contac Name:_____ Contact Telephone:_____

Fax Number:_____LOA ON FILE (Date)_____

WIN	Inter LATA PIC	Intra LATA PIC	Charge PSP to Carrier	Effective Date	Date Input
		-			
		-			
		-			
		_			
		LATA	LATA LATA	LATA LATA PSP to	LATA LATA PSP to Date

ATTN: FIRSTEL (FAX): (605) 332-8004

TC 99-030



C.R.S.T Telephone Authority

RECEIVED

JUL 0 2 1999

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

June 28, 1999

Mr. William Bullard, Deputy Executive Director Public Utilities Commission State of South Dakota 50 East Capital Pierre, South Dakota 57501

Dear Mr. Bullard:

This is a notification to the South Dakota Public Utilities Commission that the Cheyenne River Sioux Tribe Telephone Authority is currently offering and has been offering for a number of years, intraLATA equal access through its centralized equal access provider South Dakota Network. It is our understanding that the Cheyenne River Sioux Tribe Telephone Authority is in full compliance with both the Federal Communications Commission order and the South Dakota Public Utilities Commission order regarding this matter.

If you have any questions or need further assistance, please call me at (605) 964-2600.

Very, truly yours, -Ulilliana

J. D. Williams, General Manager

RECEIVED

JUL 0 7 1999



SOUTH DAKOTA PUBLIC

Michel L. Singer Attorney

UTILITIES COMMISSION

Room 1575 1875 Lawrence Street Denver, CO 80202 303 298-6527

July 6, 1999

Via Overnight Delivery

Mr. Bill Bullard Executive Director SD Public Service Commission 500 East Capital Avenue Pierre, SD 57501

Re: Implementation of Dialing Parity, Docket No. TC99-030

Dear Mr. Bullard:

In its June 15, 1999 Order in the above referenced docket, the Commission issued a list of requirements for dialing parity implementation plans. Due to technical difficulties, AT&T requested a waiver of requirement no. 6 which states:

If a new customer does not indicate a preference for a carrier, the LEC must comply with 47 C.F.R. § 64.1190(c) which prohibits the automatic assignment of a customer's intraLATA toll traffic.

The Commission denied AT&T's request for a waiver in its June 22, 1999 Order, finding that the FCC would be the appropriate regulatory agency to consider the waiver. AT&T has since made a language correction to its dialing parity implementation plan that would comply with the Commission's requirement no 6. The new language as stated in the attached revised plan is as follows:

New customers will also be informed that if the customer declines to choose an alternative carrier as part of the subscriber's new nodal agreement, service will not be provided until such a choice is made.

Mr. Bill Bullard Page 2.

If the Commission does not agree that this new language complies with requirement no. 6 of the Commission's June 15, 1999 Order, clease call me as soon as possible so that AT&T may further adjust the language.

Sincerely,

Enclosure

AT&T'S AMENDED DIGITAL LINK DIALING PARITY IMPLEMENTATION PLAN

I. Introduction

AT&T hereby files this Dialing Parity Implementation Plan in accordance with the Federal Communications Commission Order released on March 23, 1999, in Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, Petition of Southwestern Bell Telephone Company, Pacific Bell, and Nevada Bell for Expedited Declaratory Ruling on Interstate IntraLATA Toll Dialing Parity or, in the A.ternative, Various Other Relief, CC Docket No. 96-98, NSD File No. 98-121. This Plan sets forth AT&T's proposal for providing intraLATA toll dialing parity within the state of South Dakota for customers subscribing to AT&T Digital Link Service.

II. Methodology

AT&T will provide full 2-PIC (intraLATA toll & interLATA) dialing parity, allowing AT&T Digital Link Service customers to pre-subscribe to one carrier for all interLATA calls and to the same or another carrier for all intraLATA toll calls. One interLATA IXC and one intraLATA IXC may be selected for each trunk subgroup. AT&T will convert all its central offices on a statewide basis. AT&T will provide the capability for pre-subscription, however subscribers must reprogram their PBX to send their traffic to their selected carrier in order for the presubscribed choice to be effective.

III. Availability

AT&T will provide full 2-PIC dialing parity in each LATA in which AT&T offers AT&T Digital Link Service. This service is being offered in South Dakota within U S WEST's territory and concurs with U S WEST's exchange areas and exchange maps filed by U S WEST with the South Dakota Public Utilities Commission.

IV. Subscriber Practices

AT&T will provide notice to its AT&T Digital Link Service subscribers of the forthcoming availability of intraLATA toll and interLATA dialing parity by means of a one-time mailing, a copy of which is attached as Exhibit 1. This mailing will be sent 30 days prior to the implementation of dialing parity.

AT&T will inform new AT&T nodal services and AT&T Digital Link Service customers (i.e., customers that subscribe to local and long distance services on the same day) of the dialing parity feature available to them and, upon request, will provide customers a randomly ordered list of carriers available to them in their geographic area. New customers will also be informed that if the customer-does not indicate a preference for an alternate carrier, interLATA and intraLATA toll traffic sent over AT&T Digital Lin': nodal facilities will be carried over AT&Ts network as part of the subscribers' new nodal agreement declines to choose an alternative carrier as part of the subscriber's new nodal agreement, service will not be provided until such a choice is made.

AT&T will utilize competitively neutral business office practices when an existing AT&T Digital Link Service subscriber contacts AT&T to request information on dialing parity or to change to an alternate intraLATA toll and/or interLATA provider. Upon request, AT&T will provide customers a randomly ordered list of carriers available to them in their geographic area. Existing subscribers ho do not affirmatively select an alternative provider will remain with their pre-existing intraLATA toll and interLATA carrier. Unless an existing AT&T Digital Link Service subscriber requests a change to his or her presubscribed interexchange carrier ("PIC") or to his or her presubscribed intraLATA toll carrier ("PTC"), any interLATA and intraLATA toll traffic sent over AT&T Digital Link nodal facilities will continue to be carried over AT&T's network.

AT&T will accept customer-initiated or carrier-initiated requests for alternate interLATA or intraLATA toll carrier on the date of implementation. If all necessary access facilities already exist, the PIC/PTC selection will be processed within three business days. Should the installation of new access facilities (e.g., from the AT&T switch to the LEC access tandem or from the customer premises to the AT&T switch) be required, the PIC/PTC selection will be completed within three business days of the new facilities being fully provisioned and operational. The new facilities will be provisioned within standard provisioning intervals.

At this time, AT&T will not impose charges on its customers for pre-subscribing to an alternate carrier or for changing their PIC/PTC selection.

V. Carrier Practices

AT&T will notify all Feature Group D carriers operating in South Dakota no later than 35 days prior to the implementation of dialing parity. A copy of the carrier notification letter is attached hereto as Exhibit 2.

Any interexchange carrier that wishes to be listed as a provider of intraLATA toll or interLATA service at the time of dialing parity implementation shall notify AT&T no later than 30 days prior to dialing parity availability. ASR requirements are available from the AT&T Carrier Service Center. AT&T will implement ASRs that require the installation of new access facilities in accordance with standard provisioning intervals.

VI. Service to Payphone Providers

The AT&T Digital Link Service is a dedicated T-1 based service, therefore, it is not a service currently available to payphone service providers.

VI. Proposed Implementation Schedule

AT&T will implement dialing parity no later than 30 days after the date on which this plan is approved.

Exhibit 1

Date

Dear Customer,

This is to announce the availability of intraLATA toll and interLATA (including international) pre-subscription in South Dakota. Pre-Subscription gives you the opportunity to choose an alternate carrier to complete your intraLATA toll and/or interLATA calls. LATA is your Local Access and Tra: sport Area. Calls that originate and terminate within your LATA are referred to as intraLATA calls. Calls that cross LATA boundaries are referred to as interLATA calls.

AT&T currently completes your intraLATA toll and 1+ interLATA calls, and will continue to be your long distance company unless you choose otherwise.

Other companies will solicit your intraLATA toll and interLATA business. Before making a change, however, please remember that each company's rates, plans and policies are different. We encourage you to contact any long distance company that you are interested in to discuss their services in detail. For your convenience, attached is a list of long distance providers and their toll free numbers.

If you wish to change your intraLATA long distance carrier, you should directly contact the long distance company you have chosen to initiate that change with the local exchange carrier and to ensure your account is properly established. This feature is available to you effective [date]. AT&T will not impose any charges for this feature.

As always, we are grateful for your continued business. If you have any questions, please contact our business office at 1-877-325-5968 on or after [date].

Sincerely,

AT&T Local Services

Exhibit 2

Date:

To: All IntraLATA and InterLATA Carriers.

The purpose of this correspondence is to provide formal notification of AT&T's intention to offer IntraLATA and InterLATA Dialing Parity.

쇪

Effective [date] AT&T Digital Link Customers will be permitted to pre-subscribe to alternate and/or separate IntraLATA and InterLATA Carriers.

Carriers interested in participating in this offer should submit the appropriate Access Service Request (ASR) forms to the AT&T Carrier Service Center (CSC) by [date]. Carriers should provide AT&T with their toll free number by writing it on the bottom margin of the ASR form submitted to the AT&T CSC.

Requests for additional information or ASR submission may be directed to AT&T's CSC at the following address:

AT&T CSC 900 Rtes 202/206 North Room 5C250 Bedminster, NJ 07921-0752 Tel no. 908 234-7480 Fax no. 908 719-7229

Sincerely,

Neil Schmid

From: Sant: To: Cc: Subject: Neil Schmid Tuesday, July 20, 1999 8:44 AM 'Norum, Terry' Brad Vanleur, Betty Rook; Ann Deg; Tony Capers Final Firstel SD Dialing Parity Plan

South Databa Public Utilities Commission 500 East Capitol Ave. Pleme, SD 57501 JUL 2 1 1999

BECEIVED

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

Dear Mr. Bullant:

Forward to Mr. Bill Bullard:

Attached is our revised dialing parity plat for South Dekota. This final version of the plan addresses the issues raised by Karen Crismer regarding our customer notification letter and dates of implementation. This final version of the plan has been revised by Karen through our counsel, Morton Posner of Swidler, Berlin, Shereff, Friedman.

FirsTel will comply with the dates as stated in the plan. In addition to this e-mail attachment, I am sending you 10 copies of the plan via overnight mail.

1

If you have any questions, please do not hesitate to contact me.



Bundly, DOC

Null Schmid, Director of Regulatory Affairs FirsTel/Advanced Communications Group 2900 West 11th Street Slow Falls, SD 57105

> valce (605) 782-2878 fax (605) 782-2958

RECEIVED

JUL 2 1 1999

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF SOUTH DAKOTA

IN THE MATTER OF THE FCC ORDER ESTABLISHING NEW DEADLINES FOR IMPLEMENTATION OF INTRALATA DIALING PARITY BY LOCAL EXCHANGE CARRIERS) TC99-030 SU) FIRSTEL, INC UT) INTRALATA TOLL DIALING) PLAN

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

Pursuant to the Order of the South Dakota Public Utilities Commission, FirsTel, Inc. hereby submits this intraLATA toll dialing plan for Commission review and approval, according to the guidelines ordered April 2, 1999, and amended June 15, 1999:

1) a description of how the LEC will offer dialing parity for each exchange and its proposed time schedule:

Currently, FirsTel provides local exchange service only as a reseller of US West services under an approved agreement on file with the South Dakota Public Utilities Commission. As a reseller of US West's Local Service, FirsTel intends to support intraLATA dialing parity in the same manner it currently supports interLATA dialing parity in each US West exchange.

Schedule of Events:

1)	Send Carrier Letter (Exhibit B)	July 6th
2)	Carrier Response Due	July 19th
3)	Customer Notification (Exhibit A)	July 22 nd
4)	End of 60 day grace period for a free intraLATA PIC	September 21"

2) a proposal for timely notification of its subscribers and the methods it proposes to use to enable subscribers to select an intraLATA toll provider, including the language the LEC proposes to use in its customer notification letter. The proposals shall include notification to current customers and new customers who join the network after the implementation of dialing parity:

By July 22, FirsTel will notify current local exchange customers of options to select an intraLATA toll provider through a "Customer Notification Letter", which follows as Exhibit A.

 a LEC that is not a BOC must identify the LATA with which it will associate for the purposes of providing intraLATA and interLATA toll dialing parity:

In all cases, FirsTel is associated with LATA 640, NPA 605.

 a description of how carriers will be informed of the implementation process and schedule and how carriers may participate in the process:

FirsTel will notify all long distance carriers of record in the State of South Dakota of its implementation process and schedule through a letter, as shown in Exhibits B, C, D, and E.

5) a description of how the LEC's business office will handle requests to change carriers:

Requests to change carriers will be handled by FirsTel's Central Processing Department; Carriers must send or fax a completed PIC Change Request Form, as shown in Exhibit E. THE FOLLOWING ITEMS ARE CHANGES ORDERED DURING THE COMMISSIONS JUNE 15, 1999 MEETING, AND the Commission Staff recommended that the FirsTel plan be approved subject to the following issues:

"(2) FirsTel, Inc. should file a revised plan showing compliance with requirements six, seven, eight, nine and eleven as ordered by the Commission and a list of exchanges it servers and corresponding NXX prefixes":

6) if a new customer does not indicate a preference for a carrier, the LEC must comply with 47 CFR 51.209(c) which prohibits the automatic assignment of a customer's intraLATA toll traffic:

Pursuant to 47 C.F.R. § 51.209(c) and Second Report and Order, In the Matter of Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, CC Docket 96-98, § 81 (FCC Aug. 8, 1996), FirsTel will not ballot or allocate its customer base. At the time of intraLATA presubscription implementation, all customers will be "PIC'd" to FirstTel unless the customer has chosen another intraLATA toll carrier. Coincident with intraLATA toll dialing implementation, FirstTel will notify customers of the opportunity to select a differnt intraLATA toll provider. Going forward, new line customers, including customers adding lines, will have the opportunity to select a participating intraLATA carrier, or they wil' he assigned a NO PIC designation. If a customer cannot decide upon an intraLATA carrier at the time of 6. Jer, the customer will be assgned a NO PIC designation. Customers assigned a NO PIC designation will be required to dial an access code to reach an intraLATA carrier's network.

 a LEC shall send notice of the availability of dialing parity regardless of whether it has received any Access Service Requests:

FirsTel shall send notices to all Long Distance Carriers of record as indicated in #4 above.

 in addition to its customer notification letter, each LEC shall provide a list of companies the customer can choose from and the companies' toll free numbers:

FirsTel shall comply with this request by providing a list of interested eligible carriers with toll free numbers as shown in the attached customer notice. The carriers listed will be those who return the IntraLATA Equal Access Participating Carrier Form shown in Exhibit D. These carriers will be listed in alphabetical order.

9) in the customer notification letter, if the customer wants to change its existing carrier, the customer shall be told to contact the carrier it wants to change to, instead of the LEC:

FirsTel has modified its customer notification letter accordingly (Exhibit A).

10) intentionally omitted.

11) each plan shall address the issue of payphones:

At this time, FirsTel has no payphone providers under its Local Exchange Service. FirsTel will provide intraLATA access to all of its future payphone customers.

(furnish) a list of the exchanges it serves and corresponding NXX prefixes:

This listing is furnished as shown in Exhibit C.

Dated this 19th day of July, 1999.

Submitted by: Neil Schmid Director of Regulatory Affairs FirsTel, Inc. 2900 W. 11th St. Sioux Falls, SD 57104 Telephone (605) 332-3232

DRAFT Exhibit A

Customer Notification Letter

Name Address City, State ZIP

Thank you for choosing FirsTel, Inc. as your provider for local exchange telephone services. Effective July 22, 1999, FirsTel customers will be able to choose their in-state long distance carrier. We urge you to choose an instate provider as soon as possible. If you do nothing, you will be unable to reach an in-state long distance service through 1 + 605 dialing.

Your choice of an in-state long distance carrier may include FirsTel, or any other long distance carrier of record in the state of South Dakota who have indicated a desire to be a carrier of choice on our IntraLATA PIC list. For customers who currently use FirsTel Inc. by dialing 10105475 or use dialing equipment, you may PIC FirsTel Inc. to allow 1 + 605 dialing. Those carriers who have agreed to provide 1+ in-state long distance are listed on the attached "Carriers of Record" notification.

If you wish to make a change in carriers, you must contact the long distance company that you've chosen to order their service. They will contact us to complete the change.

Should you choose to make a change of in-state long distance carriers between now and September 21, 1999, there will be no charges for the PIC change. After September 21, 1999, a \$10.00 charge will appear on your bill.

If you have questions, please do not besitate to call our customer service department at 605-332-3232 or 800-605-3232.

Sincerely,

Brad Van Leur

VP, Business Markets FirsTel Iac.

SD CARRIERS OF RECORD

r

Below you will find a list of carriers who have indicated an interest in offering intraLATA 1 + in-state long distance service.

If you wish to change your intraLATA long distance carrier, please contact the carrier at the number listed to initiate the change.

	Residential	Business
Annan Telecom	1-800-555-1111	1-800-555-5555
Bibbb Telecommuciation	1-800-555-2222	1-800-555-6666
Cecence Telephone	1-800-555-333	1-809-555-7777
FirsTel, Inc.	1-800-685-3232	1-800-605-3232
Zzzzz Communiciations	1-880-555-4444	1-800-555-9999

DRAFTEXHIBITB

June 30, 1999

To: All Long Distance Carriers of Record in the State of South Dakota

RE: 1+ INTRALATA IMPLEMENTATION

RESPONSE REQUIRED BY July 19, 1999

Per the requirements of Section 251(b)(3) of the Telecommunications Act of 1996, FirsTel announces provisioning of IntraLATA and InterLATA equal access and dialing parity in the following South Dakota exchanges:

All US West Exchanges in South Dakota. See attached listing of Exchanges for 605-NXX served by FirsTel.

You must submit the attached "IntraLATA Equal Access Participating Carrier* form and be a registered carrier in South Dakota if you wish to be included in FirsTel's customer notification mailing. The form must be faxed to FirsTel and received by the close of the business day on July 19, 1999. If your company utilizes more than one CIC code, you will be listed only once on the customer notification materials.

FirsTel will work closely with all carriers of record expressing an interest to be a carrier of choice. If you are interested in receiving information which details ordering procedures, and terms and conditions for the provision of Feature Group D service please contact:

Betty Rook Account Coordinator Manager 1 irsTel, Inc. 2900 W. 11th St. Sioux Falls, SD 57104 Fax: (605) 332-8004

You may use the attached PIC Change Request Form to convert your customers to your long distance network.

If you have questions, you may contact Betty at (605) 332-3232.

Sincerely,

FIRSTEL, INC.

Brad Van Leur VP, Business Markets

DRAFT EXHIBITC

FirsTel Local Exchange Areas in South Dakota : Lata 640, NPA 605

					143
225	ABERDEEN	SD	393	RAPID CITY	SD
226	ABERDEEN	SD	394	RAPID CITY	SD
229	ABERDEEN	SD	399	RAPID CITY	SD
377	ABERDEEN	SD	787	APID CITY	SD
622	ABERDEEN	SD	877	RAPID CITY	SD
626	ABERDEEN	SD	923	RAPID CITY	SD
983	ARLINGTON	SD	472	REDFIELD	SD
892	BELLEFORCH	SD	322	SIOUX FLS	SD
987	CANTON	SD	330	SIOUX FLS	SD
599	CAVOUR	SD	331	SIOUX FLS	SD
734	CHAMBERLAN	SD	332	SIOUX FLS	SD
534	COLMAN	SD	333	SIOUX FLS	SD
854	DE SMET	SD	334	SIOUX FLS	SD
578	DEADWOOD	SD	335	SIOUX FLS	SD
356	ELK POINT	SD	336	SIOUX FLS	SD
997	FLANDREAU	SD	338	SIOUX FLS	SD
223	FORTPIERRE	SD	339	SIOUX FLS	SD
743	HARISBGTEA	SD	357	SIOUX FLS	SD
574	HILL CITY	SD	361	SIOUX FLS	SD
352	HURON	SD	362	SIOUX FLS	SD
353	HURON	SD	367	SIOUX FLS	SD
546	IROQUOIS	SD	371	SIOUX FLS	SD
584	LEAD	SD	373	SIOUX FLS	SD
584	LEAD	SD	444	SIOUX FLS	SD
584	LEAD	SD	575	SIOUX FLS	SD
847	LK PRESTON	SD	782	SIOUX FLS	SD
256	MADISON	SD	978	SIOUX FLS	SD
432	MILBANK	SD	988	SIOUX FLS	SD
853	MILLER	SD	698	SISSETON	SD
995	MITCHELL	SD	642	SPEARFISH	SD
996	MITCHELL	SD	644	SPEARFISH	SD
224	PIERRE	SD	347	STURGIS	SD
773	PIERRE	SD	368	TEA	SD
945	PIERRE	SD	624	VERMILLION	SD
341	RAPID CITY	SD	677	VERMILLION	SD
342	RAPID CITY	SD	627	VOLGA	SD
343	RAPID CITY	SD	882	WATERTOWN	SD
348	RAPID CITY	SD	884	WATERTOWN	SD
355	RAPID CITY	SD	888	WATERTOWN	SD
385	RAPID CITY	SD	269	WHITEWOOD	SD
388	RAPID CITY	SD	665	YANKTON	SD
393	RAPID CITY	SD	668	YANKTON	SD

DRAFT EXHIBIT D

FIRSTEL, INC. 2900 W. 11th St. Sioux Falls, SD 57104 (605) 332-3232 (605) 332-8004 FAX

IntraLATA Equal Access Participating Carrier Form

If you with to participate in intraLATA equal access in FirsTel's service territory, this form must be completed and returned on or before July 19, 1999.

Please submit a separate form for each CIC code.

Four Digit CIC: _____

Carrier Information:

Name:

Address:

Name as you wish it to appear on customer notification material (if different than above):

Toll Free Number for Residential Customers:

Toll Free Number for Business Customers:

Contact Person:

Name:	
Title:	
Telephone:	
FAX:	 _

PLEASE RETURN COMPLETE FORM TO:

Betty Rook Account Coordinator Manager FirsTel, Inc. 2900 W. 11th St. Sioux Falls, SD 57104 Fax: (605) 332-8004

DRAFT EXHIBITE

PIC CHANGE REQUEST FORM

Use this form to submit intraLATA/interLATA PIC change requests to FirsTel Account Coordinator

Cansier Name:_____ CIC Code:_____ Contact Name:_____ Contact Telephone:_____

Fax Number._____ LOA ON FILE (Date) _____

BTN	WTN	Inter LATA PIC	listra LATA PIC	Charge PSP to Carrier	Effective Date	Date Input
				Canal		
				1		
						in the second
			-			
			-			
a surrow a series						

ATTN: FIRSTEL (FAX): (605) 332-8004

290614.1



PO Box 455 • Bath, SD 57427-0455 • 605-225-0310 • 1-800-529-0310 • FAX 605-225-1684

July 21, 1999

RECEIVED

JUL 2 3 1999

Mr. Bill Bullard Executive Director SD Public Utilities Commission 500 East Capitol Ave. Pierre, SD 57501

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

RE: TC99-030 - NORTHERN VALLEY COMMUNICATIONS FILING OF A INTRALATA DIALING PARITY PLAN

Dear Bill:

I recently noticed Northern Valley Communication's (NVC) name on a PUC list of companies that have not filed intraLATA dialing parity plans with the Commission. NVC's CLEC network in Aberdeen is currently under construction and we have no long distance customers at this time and do not anticipate having any long distance customers until early fail 1999. Therefore, NVC did not believe it needed to file a plan at this time.

When NVC's network is constructed we will be routing our long distance traffic over SDN and NVC's 1+ plan will be nearly identical to James Valley Cooperative Telephone's plan and the other SDN members. Please let me know if you do need any further information from NVC on this matter and we will be happy to respond.

Eidah Doug Eid

CEO

CC: Clint Hanson, JVCTC

