

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

IN THE MATTER OF THE ESTABLISHMENT) TC05-093
OF SWITCHED ACCESS REVENUE)
REQUIREMENT FOR ROBERTS COUNTY) PETITION TO INTERVENE
TELEPHONE COOPERATIVE ASSOCIATION)

Pursuant to ARSD 20:10:01:15.02 AT&T Communications of the Midwest, Inc. (“AT&T”), by its undersigned counsel, petitions the Commission as follows:

1. AT&T is a certificated communications company under the jurisdiction of the Commission.

2. Roberts County Telephone Cooperative Association (“Roberts”) has or will file with the Commission, pursuant to pending staff data requests, supplemental information to justify its revised switched access separations study intended to provide a foundation for the computation of its intrastate switched access revenue requirement to be incorporated into the final LECA access tariff, which has been pending before the Commission for approximately one year.

3. AT&T recognizes this is a late filed petition for intervention. However, nothing of substance has occurred in this docket and in the LECA switched access rate dockets, TC04-119 and TC05-96. An initial filing was made, followed by an amendment to the filing. The Commission entered an order permitting the rates to go into effect subject to refund. The questions presented by this intervention and AT&T’s proposed intervention in the LECA docket constitute a matter of public interest. Overstated switched access rates by the Authority as a whole would constitute an undue burden upon Petitioner and Petitioner’s customers, thus affecting a substantial segment of telephone traffic in the state.

4. AT&T has a direct interest in the outcome of this proceeding. As a certificated local exchange carrier and long distance carrier, AT&T and its customers are subject to the payment of switched access charges in order to do business with Roberts. Any increase in access rates increases the cost of doing business for AT&T and increases the cost of services that AT&T provides to its customers.

RELIEF REQUESTED

WHEREFORE AT&T prays that the Commission permit its intervention and participation in this proceeding to examine and cross-examine witnesses, participate in discovery and offer evidence on its own behalf.

Dated this 15th day of September, 2005.

BY: _____



**ATTORNEYS FOR AT&T COMMUNICATIONS
OF THE MIDWEST, INC.**

John S. Lovald
William M. Van Camp
Olinger, Lovald, McCahren and Reimers, P.C.
117 East Capitol Avenue
P.O. Box 66
Pierre, South Dakota 57501-3105
(605) 224-8851
(877) 225-5548
Fax: (605) 224-8269

Of counsel:

John J. Reidy, III
David J. Chorzempa
AT&T Corp.
222 West Adams Street, Suite 1500
Chicago, Illinois 60606
(312) 230-3503
(312) 230-8211

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CERTIFICATE OF SERVICE

John S. Lovald hereby certifies that on the 15th day of September, 2005, he mailed by United States mail, first class postage thereon prepaid, a true and correct copy of the foregoing in the above-captioned action to the following at their last known addresses, to-wit:

Harlan Best, Staff Analyst
Public Utilities Commission
500 East Capitol
Pierre, SD 57501

Karen Cremer, Staff Attorney
Public Utilities Commission
500 East Capitol
Pierre, SD 57501

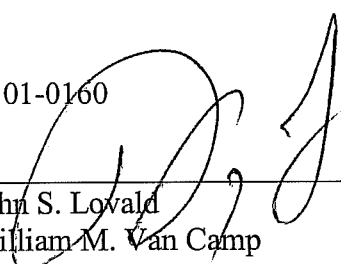
Marlene Bennett
LECA Administrator
% Martin Group
1515 North Sanborn Boulevard
Mitchell, SD 57301

Jerry Reisenauer
President
LECA
P. O. Box 39
Bison, SD 57620

Wendel Aanerud
Telec Consulting Resources, Inc.
909 North 96th Street, Suite 203
Omaha, NE 68114-2508

Pamela Harrington
General Manager
Roberts County Telephone Cooperative Assn.
P.O. Box 196
New Effington, SD 57255-0196

DAVID A. GERDES
Attorney for Midcontinent
503 South Pierre Street
P.O. Box 160
Pierre, South Dakota 57501-0160



John S. Lovald
William M. Van Camp
Olinger, Lovald, McCahren, and Reimers P.C.
PO Box 66
Pierre, South Dakota 57501