

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

**IN THE MATTER OF THE ESTABLISHMENT ) TC05-094**  
**OF SWITCHED ACCESS REVENUE )**  
**REQUIREMENT FOR McCOOK COOPERATIVE ) PETITION TO INTERVENE**  
**TELEPHONE COMPANY )**

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:

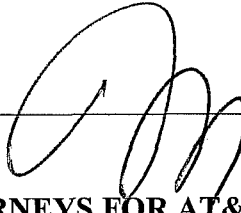
1. AT&T is a certificated communications company under the jurisdiction of the Commission.
2. McCook Cooperative Telephone Company ("McCook") has or will file with the Commission, pursuant to pending staff data requests, supplemental information to justify its revised switched access separations study 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 McCook. 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 5th 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

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

**IN THE MATTER OF THE ESTABLISHMENT            )       TC05-094**  
**OF SWITCHED ACCESS REVENUE                    )**  
**REQUIREMENT FOR McCOOK COOPERATIVE       )**  
**TELEPHONE COMPANY                             )**

**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

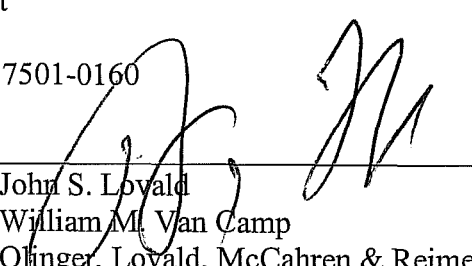
Marlene Bennett  
LECA Administrator  
% Martin Group  
1515 North Sanborn Boulevard  
Mitchell, SD 57301

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

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

Bryan Roth  
General Manager  
McCook Cooperative Telephone Company  
P.O. Box 630  
Salem, SD 57058-0630

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 & Reimers P.C.  
PO Box 66  
Pierre, South Dakota 57501