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Pam Bonrud  
Executive Secretary  
Public Utilities Commission  
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RE: **MIDCONTINENT COMMUNICATIONS**  
TC05-096  
Our file: 4959

RECEIVED  
SEP 23 2005  
PUBLIC UTILITIES COMMISSION

Dear Pam:

Enclosed are original and 10 copies of a Request for Suspension of  
Tariff in the above-referenced matter, which please file.

With a copy of this letter service by mailing is made upon the  
service list. Thank you.

Yours truly,

MAY, ADAM, GERDES & THOMPSON LLP



DAVID A. GERDES

DAG:mw

Enclosures

cc/enc: Service List

Mary Lohnes

Nancy Vogel

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA

IN THE MATTER OF THE ESTABLISHMENT ) TC05-096  
OF SWITCHED ACCESS RATES FOR THE )  
LOCAL EXCHANGE CARRIERS ASSOCIATION )

RECEIVED

SEP 23 2005

SOUTH DAKOTA PUBLIC  
UTILITIES COMMISSION

REQUEST FOR SUSPENSION OF TARIFF

Midcontinent Communications ("Midcontinent") by its undersigned counsel requests that the Commission suspend the tariff of the Local Exchange Carriers Association ("LECA") pursuant to SDCL § 49-31-12.4, as follows:

1. Midcontinent is a certificated communications company under the jurisdiction of the Commission.

2. LECA has filed with the Commission a letter and supporting documentation seeking to establish increased switched access rates for its members. Midcontinent has filed a petition to intervene in that docket. The intervention is based upon the proposition that the switched access rates currently charged by LECA members are among the highest in the nation and are significantly above the average national access rates. Upon information and belief, it is Midcontinent's understanding that AT&T and MCI have filed petitions to intervene on essentially the same basis.

3. Midcontinent has a direct interest in the outcome of this proceeding. As a certificated local exchange carrier and long distance carrier, Midcontinent and its customers are subject to the payment of switched access charges in order to do business with LECA and its members. Midcontinent has alleged in its petition to intervene that a denial of its petition will result in the inability of Midcontinent to question the basis for LECA's revised, increased switched access rates, and that approval of LECA's proposed access rates without scrutiny would be detrimental to the public interest and likely to result in a miscarriage of justice by further perpetuating artificially high switched access rates for LECA and its members.


4. Midcontinent has engaged the services of experts to review the Commission's cost model as established by its rules and believes that the cost model is outdated and inaccurately reflects the underlying cost support for the switched access rates resulting from application of the cost model.

5. For the foregoing reasons, any implementation of the proposed rates prior to their scrutiny will further drive up switched access costs for Midcontinent and its subscribers which are already artificially high.

WHEREFORE Midcontinent prays that the Commission suspend the tariff as provided in SDCL § 41-31-12.4 and permit the proceeding to go to hearing.

Dated this 23 day of September, 2005.

MAY, ADAM, GERDES & THOMPSON LLP

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CERTIFICATE OF SERVICE

David A. Gerdes of May, Adam, Gerdes & Thompson LLP hereby certifies that on the 23 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:

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