RICHARD A. CUTLER KENT R. CUTLER BRIAN J. DONAHOE *# JAYNA M. VOSS MICHAEL D. BORNITZ ‡ TRENT A. SWANSON * RYAN J. TAYLOR ° KIMBERLY R. WASSINK MEREDITH A. MOORE DAVID L. EDWARDS NATHAN S. SCHOEN *† ONNA B. HOUCK # DAVID L. REZAC CUTLER & DONAHOE, LLP

ATTORNEYS AT LAW

Telephone (605) 335-4950 Fax (605) 335-4961 AUG 0 § 2006

JEAN BROCKMUELLER, CPA (Inactive) BUSINESS MANAGER

*Also licensed to practice in Minnesota

+Also licensed to practice in Missouri

†Admitted to practice in United States Tax Court

"Also licensed as a Certified Public Accountant

SOUTH DAKOTA PUBLIC^{#Also} licensed to practice UTILITIES COMMISSION^{In Nebraska}

www.cutlerlawfirm.com

August 8, 2006

Ms. Patricia Van Gerpen Executive Director South Dakota Public Utilities Commission State Capitol Building 500 East Capitol Avenue Pierre, SD 57501-5070

> Re: ETC Filing - SSTelecom, Inc. Our File No. 2240.04

Dear Ms. Van Gerpen:

Please find enclosed for filing one original and eleven copies of the Application of SSTelecom, Inc. for Eligible Telecommunications Carrier Designation Within the Qwest Exchange of Milbank. Please return one file-stamped copy in the enclosed self-addressed, stamped envelope. Also please find enclosed a Certificate of Service signed by Ryan J. Taylor.

If you have any questions regarding this filing or require any clarification or further information, please feel free to contact me at your earliest convenience at (605) 335-4989. Thank you for your assistance and consideration in this matter.

Sincerely,

CUTLER & DONAHOE, LLP

Rvan J. Tavlor For the Firm

RJT:dah Enclosures

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IN THE MATTER OF THE APPLICATION OF SSTELECOM, INC. FOR ELIGIBLE TELECOMMUNICATIONS CARRIER DESIGNATION WITHIN THE QWEST EXCHANGE OF MILBANK

ETC PETITION TC 06-

Pursuant to ARSD 20:10:32:43 and 20:10:32:55, SSTELECOM, Inc. (SST) hereby petitions the South Dakota Public Utilities Commission (SDPUC) for its designation as an eligible telecommunications carrier in Qwest's Milbank, South Dakota exchange. Consistent with the Commission's rules, SST provides the following in support of this Petition:

1. The name, address, and telephone number of the applicant and its designated contact person:

SSTELECOM, Inc., 312 4th Street West, PO Box 920, Clear Lake, South Dakota, 57226; Telephone: (605) 874-2181; Fax: (605) 874-2014; Designated contact person: Jerry Heiberger, General Manager, Email Address: jerryhei@itctel.com. SST is incorporated in South Dakota and is a wholly owned subsidiary of Stockholm-Strandburg Telephone Company (SSTC) which is a wholly owned subsidiary of Interstate Telecommunications Cooperative, Inc. (ITC).

2. The proposed effective date of designation of eligible telecommunications carrier status:

Upon approval by the Commission.

3. Identification of the service area, including a detailed map, for which the designation is sought:

SST will serve the entire Milbank Qwest exchange as depicted on the Exchange Map attached hereto as <u>Exhibit A</u>.

4. A statement supporting the petition which specifies why the requested designation satisfies the requirements for eligible telecommunications designation and receiving federal universal service support under 47 C.F.R § 54.201 (January 1, 2006):

SST's Petition satisfies all the requirements for eligible telecommunications carrier designation and receiving federal universal service support under 47 C.F.R. § 54.201. SST will provide all the services designated in 47 C.F.R. § 54.101(a) as follows:

(1) Voice grade access to the public switched network:

SST will provide voice grade dial tone services through its own or leased facilities in the Milbank exchange. SST will utilize the existing parent company's (ITC) switch for Milbank dial tone, and the service will be provided using 605-438. ITC has a DMS10 which is capable of providing local dial tone and numerous other calling features. ITC's local network is connected to SDN Communications' tandem in Sioux Falls, which is connected to the PSTN.

(2) Local usage:

SST will charge a flat monthly service fee for local dial tone service with no limitation to the amount of minutes of use for local calls made or received.

(3) Dual tone multi-frequency (DTMF) signaling or its functional equivalent:

SST will provide DTMF signaling for all customers, shortening call set-up time.

(4) Single-party service or its functional equivalent:

SST will provide only single-party service in the Milbank exchange.

(5) Access to emergency services:

SST will have agreements and connectivity to all appropriate Public Service Access Points (PSAPs). Milbank is located within the counties of Grant and Roberts. Grant County has implemented enhanced 911, and Roberts County has not yet implemented enhanced 911. SST will provide both 911 and enhanced 911 services to the appropriate end users.

(6) Access to operator services:

SST will provide live operator services to all customers under a contract with an operator service provider based in South Dakota.

(7) Access to interexchange service:

SST will provide interexchange services to its customers. SST provides toll and toll free services. SST will also provide Interstate and Intrastate Equal Access to all customers. Therefore, customers have a variety of interexchange carriers to utilize for their long distance needs.

(8) Access to directory assistance:

SST will provide directory assistance to all customers under contract with a directory assistance provider based in South Dakota.

(9) Toll limitation for qualifying low income consumers:

SST will provide both Toll Blocking and Toll Control. All customers can order and use either service.

5. If the applicant is seeking additional time to complete network upgrades pursuant to 47 C.F. 54.101(c) (January 1, 2006), the applicant shall list the reasons why additional time is needed and the estimated length of time to complete the network upgrades:

SST is currently in the process of overbuilding the exchange of Milbank. SST is anticipating the overbuild to be completed by this fall. Under this assumption, SST meets all requirements and seeks no waivers.

6. A statement specifying why the applicant's proposed designation is in the public interest:

SST is in the process of overbuilding the Milbank exchange with a Fiber-tothe-Home architecture, and this architecture will provide enormous bandwidth for an advanced state of the art network. SST's service will provide the customers with more consumer choices, and SST will have a local customer service office in Milbank to assist the customers in their every day needs. Designating SST as an ETC will be in the public interest.

7. Demonstration of commitment to provide service:

SST commits to providing service throughout its proposed designated service area to all customers making a reasonable request for service. SST certifies that it will:

(1) Provide service on a timely basis to requesting customers within the applicant's proposed designated service area where the applicant's network already passes the potential customer's premises; and

(2) If the potential customer is within the applicant's proposed designated service area but outside its existing network coverage, provide service within a reasonable period of time, if the service does not impose excessive or unreasonable cost, by:

(a) Modifying or replacing the requesting customer's equipment;

(b) Extending facilities, such as constructing or extending an access line, or installing other equipment;

(c) Adjusting network or customer facilities;

(d) Reselling services from another carrier's facilities to provide service; or

(e) Employing, leasing, or constructing additional network facilities such as an access line or other similar equipment.

8. Submission of two-year plan:

SST believes that significant service improvements in the Milbank exchange will not be needed in the next two years. After the initial construction period, the urban areas of Milbank will be almost 100% overbuilt by SST; however, there will be ongoing upgrades and service improvements/enhancements as needed or desired by customers. Qwest currently receives Universal Service Fund High Cost Model (USF HCM) support for the Milbank exchange, and the USF HCM support to be received by SST will be used to offset the costs of ongoing upgrades, service improvements/enhancements, and maintain the existing network. 9. Demonstration of ability to remain functional in emergency situations:

SST's central office equipment is supported by battery backup and a standby generator. The fiber network is powered by remote power supplies. Each power supply has a minimum of 8 (eight) hours battery backup, which meets the PUC's backup power requirements. SST also utilizes a fiber ring configuration for rerouting traffic in the event that transport facilities are damaged. The access network has sufficient capacity for managing traffic spikes resulting from emergency situations.

10. Demonstration of ability to satisfy consumer protection and service quality standards:

All equipment used for SST's voice service is circuit switched and carrier class grade. Quality of service levels will be equal to or above standard telephony plant and will be maintained during normal operation. SST will generally follow the SDPUC's customer service rules for incumbent LECs and the SDPUC's service quality standards found at ARSD Chapter 20:10:33. SST is the only local provider to have a customer service office in the exchange. SST believes that local customer service will be one of their strongest selling points.

11. Offering of comparable local usage plan:

SST will provide flat rated local usage dial tone plans comparable to Qwest to all of its customers.

12. Provisioning of equal access:

SST certifies that it will be able to provide equal access to long distance carriers if no other eligible telecommunications carrier is providing equal access within the service area. As stated earlier, SST's local network will have connections to SDN Communications' tandem in Sioux Falls which currently provides equal access.

13. Public Interest Standard:

Designating SST as an eligible telecommunications carrier will enable SST to make ongoing upgrades and service improvements/enhancements in the Milbank exchange. The upgrades and service improvements/enhancements will, in turn, serve the public interest by offering increased consumer choice within the exchange of Milbank.

The impact of designating SST as an eligible telecommunications carrier on the Universal Service Fund will be negligible.

SST believes that there are many advantages to SST's service offering. SST is in the process of building a Fiber-to-the-Home architecture in the Milbank exchange, and this architecture will provide many advantages to the customers (i.e. enormous bandwidth to the customers home). At the present time, SST believes that there are no disadvantages of SST's service offering.

All of SST's quality of service levels are equal to or above standard telephone plant and are maintained during normal operations. SST is the only local provider to have a customer service office in the exchange.

After the initial construction period, SST will have overbuilt almost 100% of the urban areas of Milbank. SST will continue to extend its wireline facilities to serve additional subscribers which are near the outermost edge of SST's existing facilities. SST is also able to resell Qwest services via its interconnection agreement with Qwest in any areas it cannot reach with its wireline services. With all these facilities and agreements in place, SST will be able to provide the supported services throughout the Milbank exchange within a reasonable time frame.

14. Lifeline and link-up advertising requirements:

SST will make Lifeline and Link-Up services available to consumers that qualify for low-income assistance once the eligible telecommunications carrier status is granted. SST will advertise Lifeline and Link-Up and all other services via bill inserts, website, newsletters, pamphlets and newspapers. These advertisements will list the products and prices available to the consumer. SST will also adhere to ASRD 20:10:32:55 by submitting an annual report to the commission on its outreach efforts designed to increase participation in the lifeline and link-up assistance programs.

15. Study Area Code:

The Study Area Code (SAC) 399013 has been assigned to SST for its business in South Dakota.

16. Summary:

After the initial construction, SST will have overbuilt approximately 100% of the urban area in the Milbank exchange with fiber and have switching capabilities. These new facilities will bring high speed Internet, video and voice to the Milbank exchange. SST will continue to make any necessary improvements to the telecommunications services in the Milbank exchange based on customer interest. SST will also provide more improved customer service to the customers of Milbank by having a customer service office located in Milbank. For all of the above reasons, this Petition is in the public interest and should be granted by the Commission.

Wherefore, SST requests that the Commission grant this Petition and approve eligible telecommunications carrier status for it in the area described above.

CUTLER & DONAHOE, LLP Attorneys at Law

Ryan J()Taylor Nathan S. Schoen 100 N. Phillips Ave., 9th Floor Sioux Falls, South Dakota 57104-6725 Telephone (605) 335-4950 Facsimile (605) 335-4961 Attorneys for Applicant SSTELECOM, Inc.

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BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF SOUTH DAKOTA

AUG 0 9 2006

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION OF SSTELECOM, INC. FOR ELIGIBLE TELECOMMUNICATIONS CARRIER DESIGNATION WITHIN THE QWEST EXCHANGE OF MILBANK

)) SS CERTIFICATE OF SERVICE TC 06-

State of South Dakota

County of Minnehaha

I, Ryan J. Taylor do hereby certify that on this 8th day of August, 2006, I have filed the original and ten (10) true and correct copies of the Application of SSTelecom, Inc. for Eligible Telecommunications Carrier Designation within the Qwest Exchange of Milbank by First-Class United States Mail to the South Dakota Public Utilities Commission, 500 E. Capitol Avenue, Pierre, SD 57501-5070 and that a copy was served via First-Class United States Mail on the following:

Qwest Communications Corporation c/o CT Corporation System 319 S. Coteau St. Pierre, SD 57501-3108

WWC License, LLC c/o CT Corporation System 319 S. Coteau St. Pierre, SD 57501-3187

RC Communications, Inc. Pamela J. Harrington, Registered Agent PO Box 197 New Effington, SD 57255-0197 City of Brookings Utilities, Telephone Division d/b/a/ Swiftel Communications Craig Osvog, General Manager PO Box 588 Brookings, SD 57006

VCI Company National Registered Agents 300 N. Phillips Ave., Ste. 300 Sioux Falls, SD 57104-6322

Rural Cellular Corporation c/o CT Corporation System 319 S. Coteau St. Pierre, SD 57501-3108 CUTLER & DONAHOE, LLP Attorneys at Law

Ryan JoTaylor

100 N. Phillips Ave., 9th Floor Sioux Falls, South Dakota 57104-6725 Telephone (605) 335-4950 Facsimile (605) 335-4961 Attorneys for Petitioner SSTelecom, Inc.

Subscribed and sworn to before me this 8th day of August, 2006.

Notary Public*South Dakota

My Commission Expires: <u>0/-/8-08</u> <SEAL>

