LAW OFFICES

TC06-0/U

RITER, ROGERS, WATTIER & BROWN, LLP

Professional & Executive Building 319 South Coteau Street P.O. Box 280

Pierre, South Dakota 57501-0280

www.riterlaw.com

TELEPHONE 605-224-5825 FAX 605-224-7102 ACCEPTED.

JUN 2 6 2006

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

OF COUNSEL:
Robert D. Hofer
E. D. Mayer

ROBERT C. RITER, Jr. DARLA POLLMAN ROGERS JERRY L. WATTIER JOHN L. BROWN

MARGO D. NORTHRUP, Associate

June 21, 2006

Patty Van Gerpen South Dakota Public Utilities Commission 500 East Capitol Avenue Pierre, South Dakota 57501

Re:

McCook and Tri-County Applications for Extension of Deadline for Filing of

2006 Cost Studies

Dear Patty:

Please find enclosed herein for filing the original and ten (10) copies of Applications for Extension of Deadline for Filing of 2006 Cost Studies (McCook and Tri-County).

Sincerely yours,

Darla Pollman Rogers

Attorney at Law

DPR/ea

Enclosures

cc:

Bryan Roth

Tim Eklund

TC06-070

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA

Ţ	JUN 2 6 2006
•	SOUTH DAKOTA PUBLIC
	UTILITIES COMMISSION

TRI-COUNTY TELCOM, INC. APPLICATION FOR EXTENSION OF DEADLINE FOR FILING OF 2006 COST STUDY

Docket No.	
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PETITION

Tri-County Telcom, Inc. ("Tri-County") by and through its Attorney, Darla Pollman Rogers of Riter, Rogers, Wattier & Brown, LLP, respectfully requests that the South Dakota Public Utilities Commission ("Commission") allow Tri-County to file a 2006 cost study after June 30, 2006, using calendar year 2005 as its historical test year. This Petition is based on the following grounds:

- 1. ARSD § 20:10:27:07 requires a carrier's carrier to file cost data in support of its switched access service tariff no less than once every three years, but the switched access rules do not prohibit a carrier from filing cost data in support of its switched access service tariff more frequently than once every three years.
- 2. ARSD \$ 20:10:27:14 requires carriers to file a cost study within six (6) months of the close of the test year upon which the carrier is relying to support a change in switched access rates. The rule also gives authority to the Commission to grant an extension of the six (6) month filing period, upon request of the carrier.
- 3. Tri-County filed a cost study on or about June 30, 2005 (Docket TC05-098). Tri-County wishes to preserve its option to file a 2006 cost study after the filing deadline of June 30, 2006, but still use calendar year 2005 as the test year to support Tri-County's 2006 cost study.

- 4. Tri-County is requesting an extension of the six (6) month filing period, for the following reasons:
 - a. Tri-County anticipates there will be a change in the intrastate switched access rules in the near future, either through new intercarrier compensation rules adopted by the FCC, or pursuant to the rule-making docket currently pending before this Commission. Tri-County requests an extension of the six (6) month filing deadline for submitting its 2006 cost study until such time as there is a clearer indication of what will be required of carriers under the new switched access regime.
 - b. Tri-County's 2005 cost study has not yet been resolved and is currently scheduled for hearing in September, 2006. Tri-County's decision on whether to file a cost study in 2006 may be affected by the outcome of the pending 2005 docket.
 - c. Tri-County will retain its current access rates, pending the outcome of the events in subparagraphs (a) & (b) above, or until Tri-County files a 2006 cost study, pursuant to the granting of its request herein to extend the filing deadline.
- 5. Tri-County is requesting an extension to December 31, 2006, to file a 2006 cost study, using calendar year 2005 as the test year to support Tri-County's 2006 cost study.

WHEREFORE, Tri-County respectfully requests the Commission to grant Tri-County an extension of the six (6) month filing deadline for filing its 2006 cost study, to December 31, 2006, using calendar year 2005 as Tri-County's test year.

Dated this 23rd day of June, 2006.

Darla Pollman Rogers

Darla Pollman Rogers

Riter, Rogers, Wattier & Brown, LLP

P. O. Box 280

Pierre, South Dakota 57501

Telephone (605) 224-7889

Fax (605) 224-7102