LAW OFFICES

RITER, ROGERS, WATTIER & BROWN, LLP

TC06-07!

Professional & Executive Building 319 South Coteau Street P.O. Box 280 Pierre, South Dakota 57501-0280

www.riterlaw.com

ROBERT C. RITER, Jr. DARLA POLLMAN ROGERS JERRY L. WATTIER JOHN L. BROWN TELEPHONE 605-224-5825 FAX 605-224-7102

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

MARGO D. NORTHRUP, Associate

JUN 2 8 2006

June 28, 2006

SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

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

Re:

Beresford Municipal Telephone, Midstate Communications, Western Telephone company and Roberts County's 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 for the above named companies.

Sincerely yours

Margo D. Worthrup Attorney at Law

MND/ea

Enclosures

cc:

Todd Hansen

Pamela Harrington Carmen Brown Tim Eklund Marlene Bennett

REFEREN

BEFORE THE PUBLIC UTILITIES COMMISSION

JUN 2 8 2006

OF THE STATE OF SOUTH DAKOTA

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ROBERTS COUNTY TELEPHONE CO-OPERATIVE APPLICATION FOR EX-TENSION OF DEADLINE FOR FILING OF 2006 COST STUDY

Docket No.	

PETITION

Roberts County Telephone Cooperative ("Roberts County") by and through its Attorney, Darla Pollman Rogers and Margo D. Northrup of Riter, Rogers, Wattier & Brown, LLP, respectfully requests that the South Dakota Public Utilities Commission ("Commission") allow Roberts 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. Roberts County filed a cost study on or about June 29, 2005 (Docket TC05-093). Roberts 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 Roberts County's 2006 cost study.

- 4. Roberts County is requesting an extension of the six (6) month filing period, for the following reasons:
 - a. Roberts 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. Roberts 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. Roberts County's 2005 cost study has not yet been resolved and is currently scheduled for hearing in September, 2006. Roberts County's decision on whether to file a cost study in 2006 may be affected by the outcome of the pending 2005 docket.
 - c. Roberts County will retain its current access rates, pending the outcome of the events in subparagraphs (a) & (b) above, or until Roberts County files a 2006 cost study, pursuant to the granting of its request herein to extend the filing deadline.
- 5. Roberts 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 Roberts County's 2006 cost study.

WHEREFORE, Roberts County respectfully requests the Commission to grant Roberts 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 Roberts County's test year. Dated this 28th day of June, 2006.

Margo D. Northrup

Darla Pollman Rogers

Riter, Rogers, Wattier & Brown, LLP

P. O. Box 280

Pierre, South Dakota 57501

Telephone (605) 224-7889

Fax (605) 224-7102