

GUNDERSON, PALMER, GOODSSELL & NELSON, LLP

ATTORNEYS AT LAW

J. CRISMAN PALMER
G. VERNÉ GOODSSELL
JAMES S. NELSON
DANIEL E. ASHMORE
TERENCE R. QUINN
DONALD P. KNUDSEN
PATRICK G. GOETZINGER
TALBOT J. WIECZOREK
MARK J. CONNOT
JENNIFER K. TRUCANO
DAVID E. LUST

ASSURANT BUILDING
440 MT. RUSHMORE ROAD
POST OFFICE BOX 8045
RAPID CITY, SOUTH DAKOTA 57709-8045
TELEPHONE (605) 342-1078 • FAX (605) 342-0480
www.gundersonpalmer.com
ATTORNEYS LICENSED TO PRACTICE IN
SOUTH DAKOTA, NORTH DAKOTA, IOWA, NEBRASKA
COLORADO, MONTANA, WYOMING & MINNESOTA

THOMAS E. SIMMONS
TERRI LEE WILLIAMS
PAMELA SNYDER-VARNS
SARA FRANKENSTEIN
AMY K. KOENIG
JASON M. SMILEY
SIANE C. PENFIELD
JONATHAN M. OOSTRA

WYNN A. GUNDERSON
Of Counsel

9/7/06

VIA FAX 605-773-3809

Patricia Van Gerpen
Executive Director

South Dakota Public Utilities Commission
500 E. Capitol Avenue
Pierre SD 57501

FROM: Talbot J. Wieczorek

RE: RCC Minnesota TC06-100

NUMBER OF COPIES TRANSMITTED INCLUDING THIS SHEET: 6

COMMENTS:

ORIGINALS: Mailed

THE INFORMATION CONTAINED IN THIS FACSIMILE MESSAGE IS ATTORNEY PRIVILEGED AND CONFIDENTIAL INFORMATION INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY NAMED ABOVE. IF THE READER OF THIS MESSAGE IS NOT THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISSEMINATION, DISTRIBUTION OR COPYING OF THIS COMMUNICATION IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS COMMUNICATION IN ERROR, PLEASE IMMEDIATELY NOTIFY US BY TELEPHONE, AND RETURN THE ORIGINAL MESSAGE TO US AT THE ABOVE ADDRESS VIA THE U.S. POSTAL SERVICE. THANK YOU.

NOTE: If you do not receive all pages or have any problems with receiving, please call (605) 342-1078 and ask for Karen L. Webb. Thank you.

GUNDERSON, PALMER, GOODSSELL & NELSON, LLP

ATTORNEYS AT LAW

J. CRISMAN PALMER
G. VERNE GOODSSELL
JAMES S. NELSON
DANIEL E. ASHMORE
TERENCE R. QUINN
DONALD F. KNUDSEN
PATRICK G. GOETZINGER
TALBOT J. WIECZOREK
MARK J. CONNOT
JENNIFER K. TRUCANO
DAVID E. LUST

ASSURANT BUILDING
440 MT. RUSHMORE ROAD
POST OFFICE BOX 8045
RAPID CITY, SOUTH DAKOTA 57709-8045
TELEPHONE (605) 342-1078 • FAX (605) 342-9503
www.gundersonpalmer.com
ATTORNEYS LICENSED TO PRACTICE IN
SOUTH DAKOTA, NORTH DAKOTA, IOWA, NEBRASKA
COLORADO, MONTANA, WYOMING & MINNESOTA

THOMAS E. SIMMONS
TERRI LEE WILLIAMS
PAMELA SNYDER-VARNS
SARA FRANKENSTEIN
AMY K. KOENIG
JASON M. SMILEY
SHANE C. PENFIELD
JONATHAN M. OOSTRA
WYNN A. GUNDERSON
Of Counsel

September 7, 2006

VIA FAX: 1-605-773-3809

Patricia Van Gerpen
Executive Director
South Dakota Public Utilities Commission
500 East Capitol Avenue
Pierre, SD 57501

RE: In the Matter of the Request of RCC Minnesota, Inc. for Certification Regarding
Use of Federal Universal Service Support
TC 06-100 GPGN File No. 7401.040099

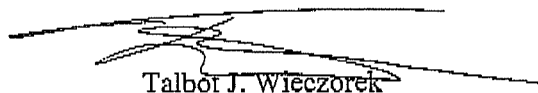
Dear Ms. Van Gerpen:

Enclosed please find the supplemental filing in the above-entitled matter. I have enclosed the original and ten copies. The pleading is public record; however, Exhibits 1 and 2 (in a separate envelope) are marked confidential.

Please note the information is confidential under A.R.S.D. 20:10:1:39(4) and (5) and because of this, RCC requests confidential treatment of this exhibit pursuant to A.R.S.D. 20:10:01:41 and that the material be held confidential for ten years and then destroyed. This information is confidential as the information is internal and proprietary, can be used adversely by competitors, and the development and financial planning constitutes trade secrets as recognized by law. If there are any inquiries as to the confidential treatment, I may be contacted at the above address.

If you need any additional information know, please let me know. Please provide me with a date-stamped copy of the filing. I have enclosed a self-addressed, stamped envelope for your convenience.

Sincerely,



Talbot J. Wieczorek

TJW:klw

Enclosures

c: Steve Otto w/ enclosures
Elizabeth Koehler w/ enclosures

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA

In The Matter of the Request of RCC)
Minnesota, Inc., for Certification)
Regarding its Use of Federal)
Universal Service Support)

SUPPLEMENTAL FILING IN SUPPORT OF RCC REQUEST FOR CERTIFICATION

RCC Minnesota, Inc., (hereinafter "RCC") by and through its attorney Talbot J.

Wieczorek of Gunderson, Palmer, Goodsell and Nelson, LLP, hereby files this Supplemental Information in Support of Request for Certification.

At the time of the ETC proceedings wherein RCC and Wireless Alliance, LLC, d/b/a Unicel (hereinafter "WALLC") requested joint designation, the companies represented that RCC would build two cell sites in the first year of complete ETC designation. Those cell sites were proposed in Willow Lake and Toronto, South Dakota.

At the time of last year's ETC certification filing, RCC was awaiting FCC concurrence in the Willow Lake and Toronto areas, among other areas. This FCC concurrence was deemed granted on November 14, 2005, and RCC received its first USF support in February 2006. RCC reported in its February 27, 2006, filing with Commission Staff the intent to construct new sites in Willow Lake and Toronto. RCC is currently reviewing leasing arrangements for both sites. Building permits and the site equipment have been received. Both sites are estimated to be completed in the fourth quarter of 2006.

The sites will initially be constructed as repeaters. The reason a repeater was selected for the locations in question is that nearby sites have more than enough capacity to handle traffic levels in these new areas. The repeaters offer a more cost effective solution. The output and receiver sensitivity of the repeater is comparable to the power output of the other cell sites in the

network. The coverage area between a repeater and a site with its own capacity is virtually identical. By using excess capacity at existing cell sites, RCC can build out coverage faster throughout a service area. As usage increases, capacity can then be added to meet demand.

RCC built out capacity in Clear Lake, South Dakota in a similar way. RCC originally installed a repeater in Clear Lake. This repeater provided only TDMA and analog service and was placed on the water tower in the Clear Lake area. As a way of upgrading the system, a new tower location has been obtained and independent capacity and a CDMA upgrade are being added. Due to increase in demand after location of a repeater in Clear Lake, additional capacity was needed to maintain service levels and, thus, RCC added capacity and, by location on a free standing tower, expanded coverage in the area.


Also submitted by RCC to Staff in its February 27, 2006, build out filing was an explanation of the Sisseton site. See letter to Staff dated February 27, 2006, reporting on build out as required by designation in TC 03 – 193 attached as Exhibit 1 (confidential exhibit). When RCC and WALLC were not jointly designated, and the final certification by the FCC was received, it became obvious that the amount of support in the RCC area would allow additional build out and tower construction while the amount of support in the WALLC area could not support the immediate expansion of two additional towers. Because of the higher support in the RCC area, a new cell site was added in Sisseton in the downtown area. At the time of the ETC proceeding, a tower existed on the outside of Sisseton that covered the area around Sisseton. However, due to terrain, the tower shot over the top of downtown Sisseton, resulting in poor or weak coverage throughout the municipality. The addition of a new cell site in the downtown area of Sisseton has provided additional coverage and capacity in that area. RCC's construction

of these three new sites and upgrading of the Clear Lake site are submitted in support of the fulfillment of the build out obligations under the ETC designation order.

RCC also submits supplemental Exhibit 2 (confidential exhibit) showing impact by wire center of the improvements discussed above and other improvements set forth in RCC's previously filed Service Improvement Plans.

Dated this 7 day of September, 2006.

GUNDERSON, PALMER, GOODSSELL
& NELSON, LLP



Talbot J. Wieczorek
Attorneys for RCC Minnesota, Inc. and Wireless
Alliance, LLC
440 Mt. Rushmore Road
P.O. Box 8045
Rapid City SD 57709
605-342-1078
Fax: 605-342-0480

CONFIDENTIAL

EX 1 + 2

CONFIDENTIAL

[]