

BROOKINGS
municipal utilities

TC06-131

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September 14, 2006

ELECTRONICALLY FILED

DATE SEP 15 2006

Harlan Best, Utility Analyst
SDPUC
500 East Capitol Avenue
Pierre, SD 57501-5070

Dear Mr. Best:

This correspondence addresses the questions and data related to your September 12th, 2006 email RE: Swiftel Certification of Federal Universal Service Support, TC06-131.

Advisor Question 1. Exhibit C - Affidavit of Steve Meyer, paragraph 5, (iii) provides equal access to long distance carriers. Does Swiftel PCS actually provide equal access to long distance carriers? Other wireless providers state that they will be able to provide equal access to long distance carriers if no other eligible telecommunications carrier is providing equal access in the service area the company serves.

A revised Affidavit is attached changing the language in paragraph 5 (iii) to "will be able to provide equal access to long distance carriers if no other eligible telecommunications carrier is providing equal access in the service area the company serves."

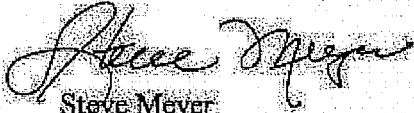
Advisor Question 2. Exhibit B - Two Year Plan, bottom half of exhibit. Swiftel PCS was authorized as an ETC in a given service area. This exhibit lists 6 communities where it may have capital expenditures for 2007 and 2008 and 2 communities where no capital improvements are planned for this same time period. What about all the other communities in the Swiftel PCS designated service area? ARSD 20-10-32-43-02 requires that "if an applicant believes that service improvements in a particular wire center are not needed, the applicant must explain its basis for this determination and demonstrate how funding will otherwise be used to further the provision of supported services in that area." A listing of the wire centers where Swiftel PCS is authorized to service was attached to its ETC petition in Docket TC04-213, specifically Exhibits B, C, and D (it lists a lot more wire centers than just 8). What is Swiftel PCS's build out plans for the complete authorized ETC service area.

Swiftel is continually expanding its RF footprint to cover an ever increasing portion of the designated service area as resources become available. The determination of what specific areas to expand into is based upon applying the available resources to the continually changing consumer and market needs. Furthermore, Swiftel is a relatively young wireless company that has only recently been designated as an ETC. As of this filing date, Swiftel has yet to realize the same market share benefits as other ETCs that have been providing service in South Dakota for years. The Two Year Plan has been submitted based upon these concepts and the information available at the time.

Therefore, while Swiftel's two year plan does not include a forecast of improvements in every wire center within its study area, Swiftel pledges to address the service improvement and build out needs of those additional communities in future filings as additional resources become available.

Please feel free to contact me if you have any questions.

Sincerely,



Steve Meyer
Executive Vice President / General Manager

Subscribed and Sworn to before me this 14th day of September, 2006.

Roberta Volkens
NOTARY PUBLIC



My Commission expires: March 21, 2011

EXHIBIT C - AFFIDAVIT

STATE OF SOUTH DAKOTA)
) SS.
COUNTY OF _____)


1. I am the Executive Vice President / General Manager of Brookings Municipal Telephone d/b/a Swiftel Communications and am authorized to give this affidavit on behalf of the Company. This affidavit is provided to support the Company's Request for Certification to the South Dakota Public Utilities Commission as contemplated in 47 C.F.R. § 54.314.

2. As an authorized representative of the Company, I hereby affirm familiarity with and an understanding of the requirements of the Federal Communications Act of 1934, as amended by the Telecommunications Act of 1996, with respect to the receipt of any federal universal service funds received as high-cost loop support, local switching support, safety net additive support and/or safety valve support.

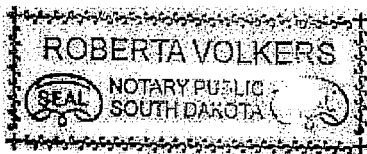
3. Since the Company was not designated as an ETC until February 2006, during 2005, the Company received no federal universal service support as shown on Exhibit A to this affidavit and therefore, had no investment and expenses relating to the provision, maintenance and upgrading of facilities and services for which such support was intended as also shown on Exhibit A.

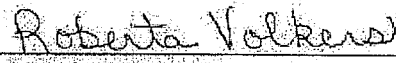
4. The Company will use the federal universal service support it receives during 2007 only for the provision, maintenance and upgrading of facilities and services for which the support is intended consistent with 47 U.S.C. § 254(e).

5. The Company (i) is in compliance with applicable service quality and consumer protection rules; (ii) is able to function in emergency situations; and (iii) will be able to provide equal access to long distance carriers if no other eligible telecommunications carrier is providing equal access in the service area the company serves.


Steve Meyer
Executive Vice President / General Manager

Subscribed and Sworn to before me this 14th day of September 2006.




NOTARY PUBLIC

My Commission Expires: March 21, 2011