

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA**

IN THE MATTER OF THE PETITION OF) TC08-017
BROOKINGS MUNICIPAL UTILITIES D/B/A)
SWIFTEL COMMUNICATIONS)
FOR SUSPENSION OR MODIFICATION OF)
47 U.S.C. SECTION 251(b)(2) OF THE)
COMMUNICATIONS ACT OF 1934 AS AMENDED.)

PETITION TO INTERVENE

Pursuant to ARSD 20:10:01:15.02 MCC Telephony of the Midwest, Inc., d/b/a Mediacom ("Mediacom") by its undersigned counsel petitions the Commission to intervene, as follows:

1. Mediacom is a certificated telecommunications carrier under the jurisdiction of the Commission, providing/seeking to provide competitive local exchange service and long distance service within the state in both rural and non-rural local exchanges.

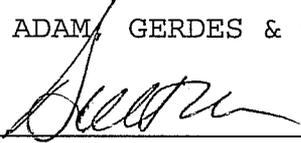
2. The petition requests suspension of Petitioner's obligation under the Telecommunications Act of 1996 to provide local number portability as provided in Section 251(b)(2) to competitive carriers in its service area. As a local exchange carrier in both US West and rural exchanges in the state, Mediacom has/would have a business interest in preserving and maintaining local number portability. A review of this petition, together with other comparable petitions filed by incumbent local exchange carriers, causes Mediacom to believe that the relief requested in the petitions if fashioned too broadly would adversely affect the manner in which Mediacom does/proposes to do business in this state.

3. Mediacom has a direct interest in the outcome of this proceeding. As a local exchange carrier any action by the Commission dealing with local number portability, if too broadly fashioned, will potentially have a direct financial impact upon Mediacom and its ability to do business in this state.

WHEREFORE Mediacom prays that the Commission permit its intervention and participation in this proceeding to examine and cross-examine witnesses and offer evidence on its own behalf.

Dated this 29th day of February, 2008.

MAY, ADAM, GERDES & THOMPSON LLP

BY: 

BRETT KOENECKE

Attorneys for Mediacom
503 South Pierre Street
P.O. Box 160
Pierre, South Dakota 57501-0160
Telephone: (605)224-8803
Telefax: (605)224-6289
E-mail: koenecke@magt.com

CERTIFICATE OF SERVICE

Brett Koenecke of May, Adam, Gerdes & Thompson LLP hereby certifies that on the 29th day of February, 2008, he filed electronically a true and correct copy of the foregoing Petition to Intervene in the above-captioned action to the following at their last known addresses, to-wit:

MS PATRICIA VAN GERPEN
EXECUTIVE DIRECTOR
SOUTH DAKOTA PUBLIC UTILITIES COMMISSION
patty.vangerpen@state.sd.us

MS ROLAYNE AILTS WIEST
STAFF ATTORNEY
SOUTH DAKOTA PUBLIC UTILITIES COMMISSION
rolayne.wiest@state.sd.us

MR HARLAN BEST
STAFF ANALYST
SOUTH DAKOTA PUBLIC UTILITIES COMMISSION
harlan.best@state.sd.us

MS MARY J. SISAK
ATTORNEY AT LAW
mjs@bloostonlaw.com

MR BEN H. DICKENS, JR.
ATTORNEY AT LAW
bhd@bloostonlaw.com

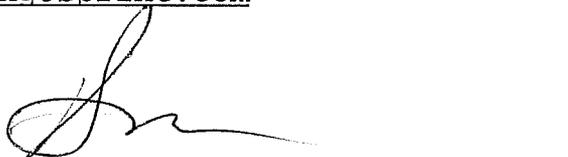
MR RICHARD J. HELSPER
GLOVER & HELSPER, P.C.
rjh1@brookings.net

MR JAMES ADKINS
TECHNICAL AND NETWORK OPERATIONS MANAGER
SWIFTEL COMMUNICATIONS
jadkins@swiftel.net

MR STEPHEN B. ROWELL
ALLTEL
stephen.b.rowell@alltel.com

MS LINDA GODFREY
VERIZON WIRELESS
Linda.godfrey@verizonwireless.com

DIANE C. BROWNING
SPRINT COMMUNICATIONS COMPANY
diane.c.browning@sprint.com

A handwritten signature in black ink, appearing to read "Brett Koenecke", is written over a solid horizontal line.

Brett Koenecke