

**MILLER
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REGULATORY CONSULTANTS

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Via E-Filing and Overnight Delivery

September 15, 2008

Ms. Pam Bonrud
Executive Secretary
South Dakota Public Utilities Commission
State Capitol Building, 1st Floor
500 East Capitol Avenue
Pierre, South Dakota 57501

RE: Central Telecom Long Distance, Inc. Application for a Certificate of Authority

Dear Ms. Bonrud:

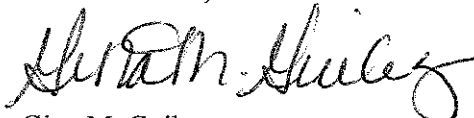
Enclosed is Central Telecom Long Distance, Inc.'s ("CTLDD") *Application for Certificate of Authority to Provide Non-Facilities-Based Interexchange Telecommunications Services Throughout the State of South Dakota* ("Application"). A check in the amount of \$250.00, the Commission filing fee, is being forwarded with a copy of this Transmittal letter via overnight delivery.

Exhibit C to the Application contains a copy of proprietary financial statements and cash flow projection, as required by Commission rules. The Company requests that the Commission treat Exhibit C as confidential information, to be reviewed by Commission staff only in the performance of their governmental duties, and not released to the public. Documents in Exhibit C are stamped "Confidential," accordingly.

Please acknowledge receipt of this filing by electronic mail. Questions regarding this filing may be directed to me.

Sincerely,

MILLER ISAR, INC.



Gina M. Guiley

Enclosures

Regulatory Consultants to
Central Telecom Long Distance, Inc.

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA

In the Matter of the Application)
of Central Telecom Long Distance, Inc.)
for a Certificate of Authority to Provide) Docket No. _____
Non-Facilities-Based Interexchange)
Telecommunications Services)
Throughout the State of South Dakota.)

APPLICATION

Central Telecom Long Distance, Inc, ("Applicant"), through its undersigned regulatory consultants, and pursuant to SDCL 49-31-3 and ARSD §20:10:42:02, hereby applies to the South Dakota Public Utilities Commission ("Commission") for a Certificate of Authority to provide non-facilities-based, resold intrastate intraLATA and interLATA interexchange telecommunications services throughout the State of South Dakota. In support of its Application, Applicant states as follows:

(1) IDENTIFICATION OF APPLICANT

Applicant's name, address, telephone number facsimile number, E-mail and web site address are (ARSD §20:10:42:02(1)):

Central Telecom Long Distance, Inc.
102 South Tejon Street, 11th Floor
Colorado Springs, Colorado 80903
Telephone: 719.471.2265
Facsimile: 719.471.2270
Email: dbaker@centraltelecomlongdistance.com
Web Site: www.centraltelecomlongdistance.com

The name under which the applicant will provide these services if different than in subdivision (1) of this section (ARSD §20:10:42:02(2)):

Applicant will provide services under its own name, Central Telecom Long Distance, Inc., in the State of South Dakota.

(2) CORPORATE AND OWNERSHIP INFORMATION

If the applicant is a corporation: (ARSD §20:10:42:02(3)):

(a) The state in which it is incorporated, the date of incorporation, and a copy of its certificate of incorporation or, if it is an out-of-state corporation, a copy of its certificate of authority to transact business in South Dakota from the Secretary of State;

Applicant is a privately-held corporation organized under the laws of the State of Colorado on December 21, 2007. A copy of Applicant's Articles of Incorporation is attached hereto at **Exhibit A**. A copy of Applicant's Certificate of authority to transact business in South Dakota from the Secretary of State is attached hereto at **Exhibit B**.

(b) The location of its principal office, if any, in this state and the name and address of its current registered agent; and

Applicant's principal office is located at:
102 South Tejon Street, 11th Floor
Colorado Springs, Colorado 80903

(c) The name and address of each corporation, association, partnership, cooperative, or individual holding a 20 percent or greater ownership or management interest in the applicant corporation and the amount and character of the ownership or management interest;

Applicant is solely owned by its President who maintains full ownership and management interest in the Applicant corporation:

Deborah Baker
Central Telecom Long Distance, Inc.
102 South Tejon Street, 11th Floor
Colorado Springs, Colorado, 80903
Telephone: 719.471.2265
Facsimile: 719.471.2270

Applicant does not have an ownership or other interest in any other entity, nor does any other entity maintain any ownership interest in Applicant.

(3) APPLICANT'S PROPOSED TELECOMMUNICATIONS SERVICE

A description of the telecommunications services the applicant intends to offer (ARSD §20:10:42:02(5)); A detailed statement of the means by which the applicant will provide its services (ARSD §20:10:42:02(6)):

Applicant proposes to provide resold non-facilities-based, switched and dedicated access, outbound interexchange telecommunications services for the direct transmission and reception of voice and data between locations throughout the State of South Dakota. Applicant also proposes to provided post-paid "travel card" services. Applicant will use the network services of its underlying carrier.

(4) GEOGRAPHIC AREAS OF SERVICE

The geographic areas in which the services will be offered or a map describing the service area (ARSD §20:10:42:02(7)):

Applicant proposes to make its services available throughout the State of South Dakota.

(5) FINANCIAL INFORMATION

Current financial statements of the applicant including a balance sheet, income statement, and cash flow statement; a copy of the applicant's latest annual report; a copy of the applicant's report to stockholders; and a copy of applicant's tariff with the terms and conditions of service (ARSD §20:10:42:02(8)):

Applicant's most recent financial statements are attached hereto at **Exhibit C**. Applicant also provides a projected cash flow statement included at **Exhibit C**. Applicant respectfully requests confidential treatment of its financial information and has filed this information under seal, accordingly. Applicant does not prepare an annual report nor does it report to stockholders.

(6) CONTACT, BILLING, AND CUSTOMER SERVICE INFORMATION

The names, addresses, telephone number, fax number, E-mail address, and toll free number of the applicant's representatives to whom all inquiries must be made regarding complaints and regulatory matters and a description of how the applicant handles customer billings and customer service matters (ARSD §20:10:42:02(9)):

The name, address, telephone number, fax number, E-mail address, and toll free number of the Applicant's representatives to whom all inquiries must be made regarding complaints and regulatory matters is:

Complaints to Customer Service
Regulatory matters to Deborah Baker

Central Telecom Long Distance, Inc.
102 South Tejon Street, 11th Floor
Colorado Springs, Colorado, 80903
Telephone: 719.471.2265
Facsimile: 719.471.2270
Email: dbaker@centraltelecomlongdistance.com

Applicant bills customers monthly through incumbent local exchange carrier billing in accordance with established Company rates.

Applicant maintains in-house customer service representatives, overseen by a Customer Service Manager. Customer service representatives are available twenty-four hours per day, to respond to billing, service, and repair complaints.

The customer's first point of contact for billing or service complaints is Applicant's Customer Service Department's trained representatives. If, after contacting Applicant's customer service representative, the customer remains dissatisfied, the customer may be connected with Applicant's Customer Service Manager. Customers will be advised that they may contact the Commission at any time for assistance in the resolution of any issue concerning the Applicant's telecommunications service.

In instances of service affecting issues or outages, Applicant will contact the designated service representative of the underlying carrier providing the network services to report the trouble and ascertain the estimated time of repair. The underlying carrier will take corrective procedures and will report the resolution of the trouble to Applicant. The company will then

immediately contact the customer and will verify with the customer that service has been restored.

Applicant does not collect deposits, advanced payments, or prepayment of recurring fees. Further, Applicant does not provide prepaid services. All charges and recurring fees are billed in arrears.

(7) OTHER STATE AUTHORITY

A list of the states in which the applicant is registered or certified to provide telecommunications services, whether the applicant has ever been denied registration or certification in any state and the reasons for any such denial, a statement as to whether or not the applicant is in good standing with the appropriate regulatory agency in the states where it is registered or certified, and a detailed explanation of why the applicant is not in good standing in a given state, if applicable (ARSD §20:10:42:02(10)):

Applicant has applied/registered for and has been granted authority to provide resold interexchange service in the following states: California (pending), Colorado, Iowa, Maine (pending), Michigan, Montana, New York (pending), North Dakota, Oregon, Texas, Utah, and Virginia. Applicant has never been denied registration or certification in any state. Applicant remains in good standing with all regulatory agencies in the states where it is registered or certified.

(8) MARKETING

A description of how the applicant intends to market its services, its target market, whether the applicant engages in any multilevel marketing, and copies of any company brochures used to assist in the sale of services (ARSD §20:10:42:02(11)):

Applicant markets its services through its in-house telemarketers. It does not use any brochures to assist in the sale of services. Consumers may obtain additional information through Applicant's web site or from Applicant's customer service representatives. Applicant does not engage in multilevel marketing

(9) COST SUPPORT

Cost support for rates shown in the company's tariff for all noncompetitive or emerging competitive services (ARSD §20:10:42:02(12)):

Applicant maintains that its interexchange services are competitive. Nevertheless, Applicant's costs are a direct function of its underlying carrier's network service costs, payroll, paid commissions, and other operational costs, balanced with maintaining a competitive rates.

(10) ADDITIONAL INFORMATION IN SUPPORT OF APPLICATION

Federal tax identification number (ARSD §20:10:42:02(13)):

Applicant's Federal Employer Identification Number is 26-1658416. Applicant does not bill nor collect sales tax from its customers. All sales tax is billed and collected by Applicant's agent, Billing Concepts, Inc. whose sales tax number is 73-017515-7.

The number and nature of complaints filed against the applicant with any state or federal regulatory commission regarding the unauthorized switching of a customer's telecommunications provider and the act of charging customers for services that have not been ordered (ARSD §20:10:42:02(14)):

No state or federal or state regulatory Commission has filed formal complaints against Applicant. Applicant maintains strict compliance with federal unauthorized account transfer regulations, 47 C.F.R. §64.1100 *et seq.*

A written request for waiver of those rules the applicant believes to be inapplicable; and (ARSD §20:10:42:02(15)):

Applicant requests that the bonding requirement as set forth in ARSD 20:10:24:04.05 be waived. Applicant does not now, nor will it in the future, collect deposits, advanced payments, or prepayment of recurring fees, nor does Applicant provide prepaid services as noted in paragraph 6, *supra*. Applicant further requests that any rule that has been deemed inapplicable to

competitive interexchange carriers and waived for other interexchange carrier applicants, be waived for Applicant.

Other information requested by the commission needed to demonstrate that the applicant has sufficient technical, financial, and managerial capabilities to provide the interexchange services it intends to offer consistent with the requirements of this chapter and other applicable rules and laws (ARSD §20:10:42:02(16)):

Applicant submits the following reasons in support of its belief that the public interest will be served by the approval of this Application:

(1) While providing its customers with cost advantages realized by Applicant's service, Applicant's service will necessarily utilize existing carrier communications facilities more efficiently through increased usage and provide greater revenues for local exchange carriers by way of additional exchange access through other carriers.

(2) Commission approval of this Application will bring the following long-term benefits to the public:

- (a) greater value to customers through lower priced, better quality network services;
- (b) innovative network services and routing;
- (c) increased carrier choice in exchange access services utilizing advanced technology;
- (d) efficient use of existing telecommunications resources as well as increased diversification and reliability in South Dakota networks; and
- (e) an additional tax revenue source for the State of South Dakota.

(11) APPLICANT'S APPLICATION CONTACT INFORMATION

Correspondence and communications regarding this Application may be directed to:


Andrew O. Isar
Miller Isar, Inc.
7901 Skansie Avenue, Suite 240
Gig Harbor, Washington 98335
Telephone: 253.851.6700
Facsimile: 253.851.6474
E-Mail: aisar@millerisar.com

Wherefore, Central Telecom Long Distance, Inc. respectfully requests that the Commission issue an order granting Central Telecom Long Distance, Inc authority to provide non-facilities-based resold interexchange services throughout the State of South Dakota.

Respectfully submitted, this 30 day of August 2008.

CENTRAL TELECOM LONG
~~DISTANCE~~, INC.

By: _____


Deborah Baker, President
102 South Tejon Street, 11th Floor
Colorado Springs, Colorado, 80903
Telephone: 719.471.2265

Andrew O. Isar
Miller Isar, Inc.
7901 Skansie Avenue, Suite 240
Gig Harbor, WA 98335
Telephone: 253.851.6700
Facsimile: 253.851.6474
E-Mail: aisar@millerisar.com

Regulatory Consultants for
Central Telecom Long Distance, Inc.

VERIFICATION OF APPLICANT

STATE OF ~~COLORADO~~ CALIFORNIA)
) ss.
COUNTY OF ~~EL PASO~~ ORANGE)

I, Deborah Baker, being first duly sworn and deposed, state that I am President of Central Telecom Long Distance, Inc. and am authorized to make this Verification on its behalf.

The statements in the foregoing Application are true of my own knowledge, except as to matters which are stated on information on belief, and as to those matters I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on ~~August~~ ^{September 5th}, 2008 at ~~Colorado Springs, Colorado.~~


~~CENTRAL TELECOM LONG
DISTANCE, INC~~

By: _____

Deborah Baker, President

Subscribed and sworn to before me this ___ day of August 2008.

Or See attached Jurat

 SEE ATTACHED JURAT

JURAT

State of California

County of ORANGE

Subscribed and sworn to (or affirmed) before me on

this 5th day of SEPTEMBER, 2008,

by DEBORAH BAKER

~~personally known to me~~ or proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.



(seal)

Signature

A handwritten signature in black ink, appearing to be "Britt Melancon", written over a horizontal line.

RE: PUC OF SOUTH DAKOTA APPLICATION OF
CENTRAL TELECOM LONG DISTANCE, INC. FOR
CERTIFICATE OF AUTHORITY

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA

In the Matter of the Application)
of Central Telecom Long Distance, Inc.)
for a Certificate of Authority to Provide) Docket No. _____
Non-Facilities-Based Interexchange)
Telecommunications Services)
Throughout the State of South Dakota.)

LIST OF EXHIBITS

EXHIBIT A	ARTICLES OF INCORPORATION
EXHIBIT B	SOUTH DAKOTA CERTIFICATE OF AUTHORITY TO TRANSACT BUSINESS
EXHIBIT C	CONFIDENTIAL FINANCIAL STATEMENTS