

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA

SOUTH DAKOTA NETWORK, LLC'S ) TC 1 1-069  
APPLICATION FOR WAIVER OF )  
SWITCHED ACCESS COST STUDY )

**PETITION TO INTERVENE ON BEHALF OF  
MCI COMMUNICATIONS SERVICES, INC. D/B/A  
VERIZON BUSINESS SERVICES**

MCI Communications Services, Inc. d/b/a Verizon Business Services ("Verizon") hereby petitions the South Dakota Public Utilities Commission ("Commission") for intervention in the above captioned proceeding filed by South Dakota Network, LLC ("SDN") pursuant to SDCL § 1-26- 17.1 and ARSD § §20: 10:01:15.02, 20:10:01:15.03 and 20: 10:01:15.05.

In support thereof, Verizon states as follows:

1. Verizon is a long distance telecom carrier and is authorized to do business in the state of South Dakota.
2. Verizon has a direct interest in the outcome of this proceeding. As a long distance carrier providing services in South Dakota, Verizon and its customers are subject to the payment of the switched access charges in order to do business in the state of South Dakota.
3. ARSD § 20: 10:27:02 requires that a waiver can only be granted based on a showing of good cause. The Application for Waiver of Switched Access Cost Study provided by SDN fails to establish good cause for a waiver.
4. We have a direct interest in the outcome of this proceeding.

WHEREFORE, Verizon requests the Commission allow Verizon to intervene in the Application for Waiver of Switched Access Cost Study so it may contest the granting of any waiver due to the failure to show good cause, examine any cost study and advocate for appropriate rates for both Verizon and South Dakota consumers.

Dated this 24 day of June, 2011.

MAY, ADAM, GERDES & THOMPSON LLP



BY: \_\_\_\_\_

BRETT KOENECKE

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d/b/a Verizon Business Services

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## **CERTIFICATE OF SERVICE**

I hereby certify that on the 24th day of June, 2011 I served a copy of Verizon's Petition for Intervention electronically to:

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A handwritten signature in black ink that reads "Brett Koenecke". The signature is written in a cursive style with a large, stylized initial 'B'.

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Brett Koenecke