

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA

SOUTH DAKOTA NETWORK, LLC's) TC11-069
APPLICATON FOR WAIVER OF)
SWITCHED ACCESS COST STUDY)

**PETITION TO INTERVENE ON BEHALF OF SPRINT COMMUNICATIONS
COMPANY, LP**

Sprint Communications Company, LP (“Sprint”) 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, Sprint states as follows:

1. Sprint is a corporation with its principal office of business at 6450 Sprint Parkway, Overland Park, Kansas 66251, and is authorized to do business in the state of South Dakota, including the provisioning of interexchange telecommunication services to various residential and business customers in South Dakota.

2. Sprint has a direct interest in the outcome of this proceeding. As a long distance carrier providing services in South Dakota, Sprint and its customers are subject to the payment of the switched access charges in order to do business in the state of South Dakota. Based on the monopolistic position of SDN, Sprint is forced to do business with SDN to deliver calls to various RLECs throughout the state. In fact, even when wireless calls are being delivered over direct connects, RLECs in the state take the position that for interMTA calls, one must pay rates as if delivered to SDN’s network in Sioux Falls.

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. SDN asserts that it should be allowed a waiver of its cost study because its rates will not go up. Sprint contends that given the rates were set in 2003, if not before, advances in technology and efficiencies should result in SDN's rate falling.

WHEREFORE, Sprint requests the Commission allow Sprint 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 Sprint and South Dakota consumers.

Dated this 24th day of June, 2011.



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CERTIFICATE OF SERVICE

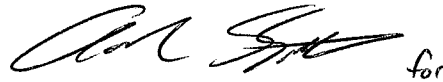
I hereby certify that on the 24th day of June, 2011 I served a copy of Sprint's Petition for Intervention electronically to:

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