

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

In the Matter of the Application of Native)	
American Telecom, LLC for a Certificate of)	
Authority to Provide Local Exchange Service)	Docket No. TC11-087
within the Study Area of Midstate)	
Communications, Inc.)	

**QWEST COMMUNICATIONS COMPANY, LLC DBA CENTURYLINK QCC'S
COMMENTS IN OPPOSITION TO NAT'S MOTION**

Qwest Communications Company, LLC dba CenturyLink QCC ("CenturyLink") submits these comments in opposition to the Motion for Grant of Authority or in the Alternative Expedited Decision filed by Crow Creek Telecom f/k/a Native American Telecom, LLC (CCT). CCT files this motion shortly after (1) announcing a corporate reorganization; (2) serving substantial additional discovery; and (3) negotiating with Sprint regarding a delay in the hearing previously scheduled for October 22-24, a delay to which QCC reluctantly agreed.

Despite all of these efforts that have resulted in delay, CCT asks the Commission to either (1) grant it authority to provide service on a temporary basis or (2) expedite its decision. CenturyLink, Sprint and other Interveners have raised significant public interest issues related to this application and CenturyLink strongly opposes this motion.

DISCUSSION

1. The Motion for a Temporary Certificate Should Be Denied.

S.D.C.L. § 49-31-3 requires that "A telecommunications Company has the burden to prove in its application that it has sufficient technical, managerial and financial capability to offer telecommunication services described in its application before the Commission may grant a certificate of authority." The statute does not provide for a "temporary" certificate.

Intervenors in this proceeding have raised substantial issues associated with CCT's application including (1) whether CCT has the financial capabilities without engaging in traffic pumping or mileage pumping; (2) whether CCT has the technical capability, given its apparent inability to directly offer direct trunk transport and its inability to describe its operations in a manner that is understandable to others in the industry; and (3) whether CCT has the managerial capability given all of the peculiarities of its application and positions it has taken in this proceeding.

Granting a temporary certificate in light of these issues and without statutory authorization would cast these concerns aside and create an incentive for CCT to further delay this proceeding that has taken forever.

2. CenturyLink is Ready for Hearing.

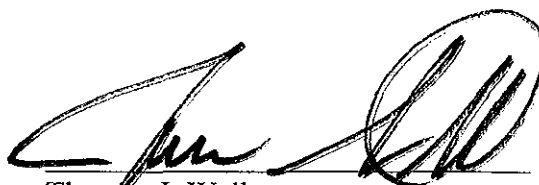
CenturyLink has no objection to holding the hearing in this matter as quickly as possible and has advocated for a quick hearing for some time. CenturyLink does find this motion odd, however, given that Sprint and CCT asked for an extension of the then scheduled October 22 hearing due to discovery issues between them. If the discovery is necessary, it would be improper to hold the hearing before those issues are resolved. If the discovery is not needed, CenturyLink is ready to move forward.

CONCLUSION

CenturyLink respectfully requests that the Commission (1) deny the request for a temporary certificate and (2) hold the hearing in this matter as quickly as the parties are ready to do so.

It cites no statutory authority for the commission to issue a temporary certificate, and even if one were available, the complexity of this docket and the significant public interest issues raised by interveners in this case suggest that

Dated this 3rd day of October, 2013.



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CERTIFICATE OF SERVICE

I, Jason R. Sutton, hereby certify that I am a member of the law firm of Boyce, Greenfield, Pashby & Welk, L.L.P. and that on the 3rd day of October, 2013, I electronically filed **Qwest Communications Company, LLC dba CenturyLink QCC's Comments in Opposition to NAT's Motion** and emailed a true and correct copy of the foregoing to the following persons:

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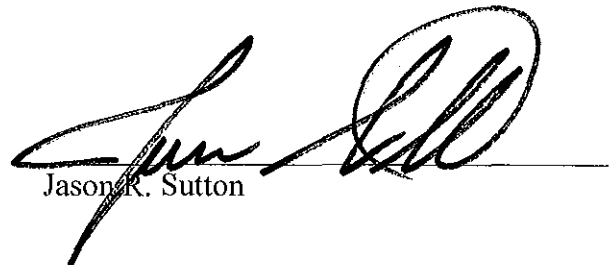
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