

**BEFORE THE
SOUTH DAKOTA PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF THE PETITION OF
INTERSTATE TELECOMMUNICATIONS
COOPERATIVE, INC. FOR
ESTABLISHMENT OF RATE CENTER

TC 11-

COMES NOW, Interstate Telecommunications Cooperative, Inc., by and through its undersigned counsel, and hereby files this Petition for Establishment of Rate Center. In support of its Petition, ITC states and declares as follows:

1. Interstate Telecommunications Cooperative, Inc. (hereinafter "ITC") is a South Dakota cooperative corporation headquartered in Clear Lake, South Dakota. ITC presently operates twenty-six (26) local telephone exchanges serving approximately 14,232 access lines in the State of South Dakota.

2. Currently, both ITC and Brookings Municipal Utilities, d/b/a Swiftel Communications, provide local exchange service in certain portions of the Brookings exchange area. That portion of the Brookings area in which ITC has provided service has been recognized by both ITC and this Commission as "Brookings Rural". This exchange, however, consists of only one rate center.

3. ITC seeks the creation of a new rate center so as to formally recognize the status quo and appropriately delineate and separate that rural portion of the City of Brookings which ITC currently serves so as to ensure that the boundaries for local calling, billing and assigning of phone numbers accurately reflect the service areas of both ITC and Swiftel. The rate center will be identified as "BROOKINGS RURAL" and will be identified by the V&H coordinate of the

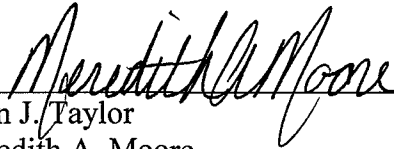
switch Code Common Language Location Identifier or CLLI code for the Brookings Rural exchange.

4. Because Brookings Rural has consistently been treated as a separate exchange area, the establishment of a separate rate center is not expected to affect local rates, services currently provided to ITC customers, long distance service or e911 or PSAP services. Any costs associated with the establishment of this rate center are anticipated to be de minimus and will not be passed on to ITC's customers. Additionally, the local calling plan for ITC's customers will not change.

5. Before ITC may delineate its service territory in the Brookings exchange from that of Swiftel as contained within the Telcordia Business Integrated Routing and Rating Data Base System for carrier review in the Local Exchange Routing Guide, ITC must obtain the approval from this Commission. Accordingly, ITC respectfully requests that this Commission create a separate rate center for that portion of the Brookings exchange served by ITC, which is currently identified by ITC as Brookings Rural. If the Commission grants this Request, ITC requests that it issue a ruling stating as such.

Dated this 9th day of November, 2011.

Respectfully submitted,



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