

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

In the Matter of the Petition of)	
WWC License, LLC and RCC)	
Minnesota, Inc. for Relinquishment)	TC12-158
Of Eligible Telecommunications)	
Carrier Designation)	

FURTHER COMMENTS OF THE CROW CREEK TRIBAL UTILITY AUTHORITY

The Crow Creek Tribal Utility Authority of the Crow Creek Sioux Tribe (“Tribal Authority”) hereby submits these Further Comments on the Petition for Relinquishment of Eligible Telecommunications Carrier Designation by WWC License, LLC and RCC Minnesota, Inc. filed with the Commission on September 21, 2012 (“Verizon Petition”). On November 14, 2012, the Tribal Authority filed comments on the Verizon Petition “to ensure that the needs of all universal service consumers, including Verizon’s Lifeline customers on the Crow Creek reservation, are properly addressed in any relinquishment of Verizon’s ETC status.” In these Further Comments, the Tribal Authority notes that the Federal Communications Commission (“FCC”) recently allowed Verizon to relinquish its ETC designations in certain states based, in part, on the fact that there were several other wireless ETCs in these states that would be able to continue to serve the universal service, including Lifeline, needs on consumers.¹ In contrast, there are no other wireless ETCs providing universal service, including Lifeline service, in South Dakota, so it is

¹ *In the Matter of Carriers Eligible for Universal Service Support et al.*, WC Docket No. 09-197, Order, DA 12-1851 (rel. November 16, 2012) (*Verizon Relinquishment Order*). See attached *Verizon Relinquishment Order* and the Verizon petition requesting relinquishment, which includes an exhibit identifying the other competitive ETCs in the states in which Verizon was seeking relinquishment.

imperative for the Commission to carefully review the Verizon Petition based upon the specific facts in South Dakota and ensure that consumers continue to have access to affordable telecommunications services. As stated in its Comments, the Utility Authority oversees and regulates the provision of telecommunications services on the Crow Creek reservation and is not seeking to force Verizon to remain an ETC, if they have not interest in continuing to serve the universal service needs of consumers on the Crow Creek reservation; however, the Utility Authority believes that Verizon should be required to submit a detailed transition plan for its exit from the universal service market that, among other things: (i) identifies all of its universal service customers, including Lifeline customers, within each defined geographic area of South Dakota, such as the Crow Creek reservation; and (ii) identifies the remaining universal service options for these customers.² The Utility Authority notes that Verizon Wireless has an obligation, pursuant 47 C.F.R. § 54.313(a)(9), to consult with the Tribes in South Dakota, including the Crow Creek Sioux Tribe, but, to date, Verizon Wireless has not met its tribal consultation obligations in 2012.

Respectfully submitted,
Crow Creek Tribal Utility Authority

By: //Brandon Sazue//
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Chairman
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² For example, on the Crow Creek reservation, Native American Telecom, LLC provides basic and advanced telecommunications services on the Crow Creek reservation and may be able to serve Verizon's universal service customers on the Crow Creek reservation.

Service List TC12-158

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