# Docket: TC 12-182

Subject:Third Data RequestRequest To:Interstate Telecommunications Cooperative, Inc. (TC 12-182)Request From:South Dakota Public Utilities Commission StaffResponse Date:November 13, 2012

# Request 3-1:

Does ITC plan to continue offering the long distance service currently offered by SSTELECOM? If so, does ITC propose a transfer of the interexchange certificate of authority currently held by SSTELECOM, or does ITC wish to cancel the COA held by SSTELECOM and apply for one of their own?

# Response 3-1:

ITC currently has IXC authority and will continue to offer long distance services to all its members, including the new members that formerly received long distance services from SSTELECOM. ITC has its own long distance authority and therefore any further IXC authority being transferred from SSTELECOM would be redundant and not necessary. Therefore, the PUC can cancel SSTELECOM's IXC Certificate of Authority and ITC will provide long distance services under its current authority to these new members.

### Request 3-2:

Does ITC offer any prepaid services to retail customers (including prepaid calling cards) or require deposits or advance payments from retail customers? Keep in mind that billing for monthly service is an advance payment if collected before service is rendered. If yes, does ITC plan to continue the bond currently held by SSTELECOM?

### Response 3-2:

ITC does bill all its customers for local exchange service one month in advance of service, does charge for deposits and does provide prepaid calling cards. However, the SDPUC has never required a bond for any ILEC in SD. Further, ITC has a long history of providing outstanding customer service and is very stable financially. Therefore, there is no need or justification for a bond. Based on these facts and Commission precedent of not requiring bonds for ILECs, ITC would ask that no bond be required. If the Commission staff feels that the bonding requirement would apply in any way, ITC would hereby ask that any such requirement be waived.