

**BEFORE THE
SOUTH DAKOTA PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF THE REQUEST OF		
TRIOTEL COMMUNICATIONS INC.,)	
STUDY AREA CODES MCCOOK 1669)	
AND TRI-COUNTY 1682 - FOR)	ANNUAL ETC CERTIFICATION
CERTIFICATION REGARDING ITS USE)	FILING
OF FEDERAL UNIVERSAL SERVICE)	
SUPPORT.)	

TrioTel Communications Inc. (the “Company”), by and through its attorney, makes this filing to seek certification from the South Dakota Public Utilities Commission (the “Commission”) as is required under 47 C.F.R. § 54.314 and to comply with the provisions of ARSD §§ 20:10:32:52 and 20:10:32:54 of the Commission’s rules pertaining to eligible telecommunications carriers (“ETCs”).

In accordance with 47 C.F.R. § 54.314, federal universal service support provided to carriers pursuant to 47 C.F.R. §§ 54.301, 54.305 and/or 54.307 and/or Part 36, Subpart F (high-cost loop support, local switching support, safety net additive support and safety valve support) will be made available only if the State Commission files the requisite annual certification with the FCC and USAC. The certification required specifically for rural carriers to receive federal universal service support for all four quarters during calendar year 2013 is currently due to be filed with the FCC and USAC on or before October 1, 2012. The certification may be presented to these entities in the form of a letter from the State Commission. The letter must identify which carriers in the State are eligible to receive federal support during the 12-month period and must certify that the carriers listed will only use the support for the provision, maintenance and upgrading of facilities and services for which the support is intended.

As part of its annual request to the Commission for certification, the Company provides the following information:

1. The Company is a rural telephone company that has previously been designated by this Commission as an ETC. The Company provides local exchange telephone services, including all of the essential services that are included in the federal definition of universal service, to approximately 2,298 access lines within its established rural service area in South Dakota.

2. The provisions of ARSD § 20:10:32:54 addressing the annual “Certification requirements” set forth by this Commission indicate in part that the ETC must show “how much universal service support was received.” Accordingly, the Company’s 2011 federal universal service receipts are reflected on Confidential Exhibit A-1 for McCook 1669 and A-2 for Tri-County 1682 hereto (presented as part of the Company’s “Progress Report”). These same Confidential Exhibits also show total expenditures of the Company in 2011 related to the provision, maintenance and upgrading of the facilities and services that are supported by federal universal service funding. In addition, to the extent changes have occurred, to date, with respect

to the Company's planned 2012 investments noted in last year's two-year plan, the changes are referenced in Confidential Exhibits A-1 and A-2. Estimates of the expenditures to be made by the Company for calendar year 2013, related to the provision, maintenance, and upgrading of facilities and services supported by federal universal service, are provided on Confidential Exhibit B-1 for McCook 1669 and B-2 for Tri-County 1682 hereto as part of the Company's current Two-Year Plan. Consistent with federal universal service principles, the Company will use federal universal service amounts received in 2013 to offset a portion of these 2013 expenditures. This use of federal universal service support will enable the Company to: (1) maintain rates for its local exchange services that are affordable and reasonably comparable to rates being charged for the same services in urban areas; and (2) to upgrade its telecommunications facilities and equipment as necessary to meet evolving service requirements and maintain high quality service. The use of federal universal service support for these purposes is clearly consistent with the federal universal service provisions.

3. In addition to the information included in Confidential Exhibits A-1, A-2, B-1, and B-2, the following information is provided to meet the Commission's "Certification requirements" set forth in § 20:10:32:54:

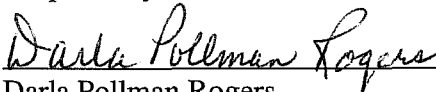
- During calendar year 2011, the Company experienced the following service outages affecting at least 10 percent of its end user customers, for a period lasting longer than 30 minutes:
 - a) On January 19, 2011, from 6:00 a.m. – 7:00 a.m., the OLTG Card in the Kampshoff Cabinet in the Canova exchange failed which affected dial tone, video, and data services for FTTH customers. We resolved the issue by replacing the bad OLTG Card from the Cabinet. Since the outage was a result of an electronics failure there are no certain preventative steps to take to prohibit this from occurring again in the future. The outage affected 61 (of 171) customers.
 - b) On April 30, 2011, from 2:30 p.m. – 3:15 p.m., at the Central Office in the Center exchange the OLTG Port failed on GPON Port 2 which affected dial tone, video and data services. We resolved the issue by rebooting the OLTG Card. Since the outage was a result of an electronics failure there are no certain preventative steps to take to prohibit this from occurring in the future. The outage affected 32 (of 95) customers.
 - c) On December 9, 2011, beginning at 2:00 a.m., while moving services from the CopperCom switch to the new Genband C15 switch, there were outages to all 374 subscribers in the Emery and Clayton exchanges for 800 calls, operator calls, 911 service, EAS, and long distance service. The Genband C15 switch had difficulty supporting MF to ISUP trunks but was resolved when Genband installed a patch to correct the problem. Additionally, we made new 800, operator and 911 trunks to correct the AIN information trouble that was not previously passed through to the Genband switch. Outages were approximately five hours for 800 and operator calls, one hour for 911, and two hours for EAS calls and long distance service. There are no other switch upgrades scheduled at this time, therefore, this issue should not recur in the future.

- The Company was able to provide service to all potential customers that requested service during 2011, and as of December 31, 2011 the Company had no unfulfilled requests for service.
- During 2011, the Company's customer service department received two complaints from consumers. Both of these complaints were received by the Company more formally as written complaints or as complaints that needed to be resolved with the involvement of other Company representatives outside of the customer service department.
- Also attached as "Exhibit C" is a document containing other certifications, including those required under the provisions of ARSD §§ 20:10:32:54(6), 20:10:32:54(7), 20:10:32:54(8) and 20:10:32:54(9).

4. Based on all of the foregoing information, including the information provided on Confidential Exhibits A-1, A-2, B-1, and B-2 and on Exhibit C, the Company requests that this Commission issue an appropriate certification to the FCC and USAC indicating that TrioTel Communications Inc. (McCook 1669 and Tri-County 1682) is in compliance with 47 U.S.C. § 254(e) and should receive all federal universal service support determined for distribution to the Company in 2012. In order to ensure that this certification is issued to the FCC prior to October 1, 2012, the Company would further ask the Commission to expedite the process that is initiated based on this filing.

Dated this 25th day of May 2012.

Respectfully submitted,



Darla Pollman Rogers

Margo D. Northrup

Riter, Rogers, Wattier & Northrup, LLP

P.O. Box 280

Pierre, SD 57501

Phone (605) 224-5825

Attorneys for the Company