Docket Number:TC15-063Subject Matter:Second Data RequestRequest to:Midcontinent CommunicationsRequest from:South Dakota Public Utilities Commission StaffDate of Request:October 1, 2015Responses Due:October 8, 2015

## Midcontinent's Application for Waiver of ARDS 20:10:32:15 CONFIDENTIAL RESPONSE TO SECOND DATA REQUEST:

## 1-1. Will the waiver impact universal service? Why or why not?

**RESPONSE:** Midcontinent does not intend to apply for certification as an eligible telecommunications carrier in Bowdle or Roslyn exchanges. Midcontinent is not able to determine if there is any impact to Venture Communications because we have no knowledge of their financials or network, including line counts. However, any universal service impact to a rural carrier is more likely due to ICC Reform than what it is from a competitor, such as Midcontinent, in their exchange. Under the ICC Reform Order, RLECs will continue to receive support through 2017 while CLECs have been on a downward scale and in 2016 will no longer receive high-cost support.

## 1-2. How will you assure that quality of service will continue?

**RESPONSE:** It is Midcontinent's standard practice to attain, maintain and deliver high-quality services to our customers. Midcontinent invests in its staff by providing training, coaching and mentoring so they can assist customers with having a good experience using their Midcontinent services. Midcontinent also invests to continually maintain, upgrade and add new services that our customers come to expect. Reports, and or records, are kept in the various departments to monitor compliance of all quality standards.

## 1-3. Why is granting the waiver in the public interest?

**RESPONSE:** Midcontinent is able to satisfy all the requirements necessary to provide local exchange service, which includes access to the public switched network, access to emergency services, local directory and directory assistance, nonpublished service, operator services, telecommunications relay services, and access to interexchange services. Because Midcontinent is able to provide all the necessary requirements of a local exchange carrier it is in the public's interest to approve its application; because Midcontinent does not intend to seek designation as an Eligible Telecommunications Carrier and is able to satisfy the requirements of a local exchange provider the Commission should grant the requested Waiver.