

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

In the Matter of Long Lines Wireless, LLC)
Petition to Relinquish its Designation) **Docket # TC-16-_____**
As an Eligible Telecommunications Carrier)

**LONG LINES WIRELESS, LLC PETITION TO RELINQUISH ITS
DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER**

1. Long Lines Wireless, LLC (Long Lines) hereby submits this petition for relinquishment of its designation as an eligible telecommunications carrier (ETC) for the areas within its designated ETC area in South Dakota, pursuant to Section 214(e)(4) of the Communications Act of 1934, as amended in 1996 (the "Act"), Part 54 of the Federal Communications Commission's (FCC) rules and regulations governing universal service, and South Dakota Administrative Code (the "Code") Rule 20:10:32:48.
2. Long Lines was authorized by the FCC as a wireless carrier in the states of Iowa, Nebraska and South Dakota. On August 26, 2008, the South Dakota Public Utilities Commission Commission) approved Long Lines request for ETC designation as originally filed in docket TC-06-184.
3. In its designated ETC areas, Long Lines provided wireless voice, data and internet access services through its own wireless network in addition to providing nationwide service through a number of roaming partners. The Universal Service Administrative Company (USAC) assigned the Study Area Code of 399016 to Long Lines for the state of South Dakota.
4. In Long Lines initial filing, a request was made for ETC status servicing wire centers in eastern and western South Dakota, where Long Lines had been awarded wireless spectrum. Long Lines built out its wireless network to service customers in the majority of the ETC territory in eastern South Dakota, however, due to market conditions, the expansion of the territory into the remaining wire centers in eastern South Dakota was limited and Long Lines sold its spectrum in western South Dakota and no longer intended to build out its network in that area. Long Lines sought to amend the scope of Long Lines ETC designation to exclude those areas where the company did not intend build out its network. Long Lines sold all its wireless license to be effective December 2013 and does not wish to retain the ETC designation for the area previously served. Long Lines is now requesting its ETC status be relinquished in its entirety.

5. On August 26, 2011 Long Lines made a filing to partially relinquish some of the area originally approved for its ETC status. The Commission approved a modification of Long Lines ETC serving area in Docket TC-11-082 on October 31, 2011. In addition, the Commission approved another modification to its ETC status in Docket TC-14-056 to allow Long Lines to receive federal support for the preceding period prior to its sale of the license. All applicable notices to affected carriers and Long Lines customers were provided in those dockets.

6. Pursuant to §214(e)(4) of the Telecom Act and Rule 20:10:32:48 of the Code, the relinquishment of ETC designation requires the approval of the Commission and the Commission shall permit an eligible telecommunications carrier to relinquish its designation as an ETC in any areas served by more than one eligible telecommunications carrier. Rule 20:10:32:48(4) further states that, "Prior to permitting a telecommunications carrier designated as an eligible telecommunications carrier to cease providing universal service in an area served by more than one eligible telecommunications carrier, the Commission shall ensure that all customers serviced by the relinquishing carrier continues to be served, and shall require sufficient notice to permit the purchase or construction of adequate facilities by any remaining eligible telecommunications carrier". Since Long Lines ceased to provide service in 2013, the customers have been served since that period.

7. As demonstrated herein, Long Lines meets the requirements of §214(e) (4) and Rule 20:10:32:48. First, the areas to be relinquished pursuant to this petition is currently served by at least one incumbent local exchange carrier with an approved ETC designation as identified in TC-11-082 and TC-14-056. Second, as ETCs and telecommunications carriers, those companies are required to provide service to everyone in their service areas, which would be all of the customers that Long Lines would have provided service to.

8. It is respectfully submitted that the public interest would be served by allowing Long Lines to relinquish ETC status. The purchasing company is already serving the areas for which Long Lines held ETC status. Long Lines has discontinued operations and therefore has a legitimate operational reason to discontinue ETC status in the previously served area, which includes its prior telephone service area and immediately surrounding rural communities.

9. In light of the preceding, Long Lines respectfully requests that the Commission grant this Petition to Relinquish Eligible Telecommunications Carrier Designation and issue an Order completely removing the ETC Status of Long Lines Wireless, LLC designation as an ETC in South Dakota.

Respectfully submitted,

LONG LINES WIRELESS, LLC



Paul Bergmann
Chief Financial Officer

Dated February 10, 2016