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July 20, 2016

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Via E-Filing

South Dakota Public Utilities Commission
Attn: Patrick Steffensen
State Capitol Bldg., 1st Floor
500 East Capitol Avenue
Pierre, SD 57501

Re: Premier Communications, Inc., (Docket TC16-041)
Response to First Data Request

Dear Mr. Steffensen:

Premier Communications, Inc., (the "Applicant"), by its undersigned counsel, hereby responds to the First Data Request of the South Dakota Public Utilities Commission staff, dated July 6, 2016 (the "First Data Request").

1-1) Per ARSD 20:10:24:02(10), provide Ryan Boone's facsimile and toll free numbers and a confirmation that he will handle all complaint inquiries and regulatory matters. If he is not the representative for both matters, provide the name(s), address(es), telephone number(s), facsimile number(s), e-mail address(es), and toll free number(s) of the additional representative(s) and indicate which area(s) they are responsible.

Response: Ryan Boone will handle all complaint inquires and regulatory matters. His facsimile number is (712)722-1113 and toll free number is 1-800-741-8351.

1-2) Per ARSD 20:10:24:02(15), provide whether the applicant has ever been denied registration or certification in any state and the reasons for any such denial. Also, provide a statement as to whether or not the applicant is in good standing with the appropriate regulatory agency in the states where it is registered or certified.

Response: Applicant has never been denied registration or certification in any state. The applicant is in good standing with the Iowa Public Utilities Commission. The Applicant has also applied for a certificate of authority to provide long distance services in Minnesota and is awaiting action from the Minnesota Public Utilities Commission.¹

¹ On July 14, 2016, Staff from the Minnesota Department of Commerce filed comments recommending approval of the Applicant's Minnesota application for a certificate of authority to provide long distance services.

- 1-3) Per ARSD 20:10:24:02(16), provide copies of any company brochures used to assist in the sale of services.**

Response: The Applicant does not currently have any brochures to assist in the sale of long distance services. The only documentation that Applicant has is the internal subscriber application, attached hereto as Exhibit A, that lists the two long distance plans for customers to choose from.

- 1-4) Per ARSD 20:10:24:02(4) and ARSD 20:10:24:02(17), when does the applicant anticipate it will receive its Secretary of State certificate of authority and South Dakota sales tax number?**

Response: Applicant received its Certificate of Authority as a Foreign Business Corporation, attached hereto as Exhibit B, from the South Dakota Secretary of State on June 13, 2016. Applicant received its South Dakota Sales Tax License and Number on July 19, 2016. The sales tax number is 1031-1023-ST and such license is attached hereto as Exhibit C.

- 1-5) Refer to the last paragraph of section 19 of the application. Provide confirmation that this statement is not requesting a specific waiver, and explain the purpose behind providing this statement.**

Response: To the extent that Applicant may be considered an emerging competitive service provider, Applicant respectfully requests a waiver of the requirement that it file a tariff under SDCL 49-31-12.7 and any other applicable statute or administrative rule. As stated in Section 19 of the Application, the Applicant requests that it be permitted to operate under oversight by the Iowa Utilities Board in such a manner consistent with its other customers, and not be required to file a tariff in South Dakota. It is important to note that Applicant will only provide service to those customers of its affiliated ILEC, which consists of no more than 147 access lines in South Dakota (representing only 2% of Applicant's total long distance customers after completion of the Transfer of Control Transaction). Further, all of Applicant's physical switches and central office locations, including those which provide service to the 147 South Dakotans, are all located in Iowa, and the scheduled rates are comparable or lower than comparable South Dakota rates. For the foregoing reasons, the Applicant requests such waiver of the requirement that it be required to file a tariff under SDCL 49-31-12.7.

Please do not hesitate to contact me if you have any questions or if we can be of other assistance. You can reach me on my direct line at 271-4938.

Sincerely,

CUTLER LAW FIRM, LLP



Eric E. Erickson
For the Firm

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Enclosures