

**Docket Number:** TC17-009  
**Subject Matter:** Second Data Request  
**Request to:** ExteNet Systems  
**Request from:** South Dakota Public Utilities Commission Staff  
**Date of Request:** 4/25/17  
**Responses Due:** 5/2/17

1-1 Supplemental response:

Please find the Notice of Application Certificate of Service attached.

2-1. In section 23 on page 9 off the application, ExteNet requests a waiver of ARSD 20:10:32:10. Pursuant to that rule, provide an explanation, "in writing, why the company is unable to comply" for each section, 1 through 7, of the rule.

Pursuant to ARSD 20:10:32:10, a carrier must provide the following service, unless granted waiver:

- (1) Access to the public switched network;
- (2) Access to emergency services such as 911 or enhanced 911;
- (3) Access to a local directory and directory assistance;
- (4) Access to operator services;
- (5) Telecommunications relay service capability or access necessary to comply with state and federal regulations;
- (6) Nonpublished service upon written or verbal request of the customer; and
- (7) Access to interexchange services.

ExteNet respectfully requests a waiver of ARSD 20:10:32:10 for the following reason:

ExteNet will not be providing traditional end user local exchange services within South Dakota. If ExteNet were to provide any end user service, it would consist solely of non-switched fiber transport for enterprise-level business customers. (See for example AT&T Stadium: <http://www.extenetsystems.com/casestudies/attstatium>.)

ExteNet does not provide "dial tone" type services, and ExteNet will not be interacting with the Public Switched Telephone Network. Therefore, ExteNet will not have any interaction with emergency services such as 911 or enhanced 911, operator services, interexchange services, directory assistance, and telecommunications relay services.

ExteNet's services are similar to those of Crown Castle, which was granted certification and waiver of ARSD 20:10:32:10 in Docket TC14-081.

2-2. Refer to the response to DR1-4 and to the last paragraph on page 3 of the application. The Company states in DR1-4 "ExteNet does not provide, nor does it intend to provide, exchange access or local exchange end user services in rural areas." But on page 3 ExteNet states "ExteNet does not intend to furnish switched voice services or dial tone, though it may

provide those services to end-user customers in the future if market demand arises.” Will ExteNet offer any switched access in the future in any rural or non-rural territory? Specifically, which ILEC territories in South Dakota does ExteNet plan to do any telecommunications business in?

ExteNet will not offer any switched access service in any rural or non-rural territory in South Dakota.

ExteNet requests authorization to provide non-switched fiber service to enterprise-level business end-users only in non-rural areas, such as the ILEC territories of CenturyLink.

- 2-3. If the company does plan to potentially offer any switched access services in the future with this application, provide an explanation of why a waiver of ARSD 20:10:32:15 would be acceptable pursuant to ARSD 20:10:32:18.

ExteNet does not offer switched access service. ExteNet will not offer switched access service in the future.