

BEFORE THE PUBLIC UTILITIES
COMMISSION OF THE STATE OF
SOUTH DAKOTA

IN THE MATTER OF THE PETITION FOR A) TC17-063
DECLARATORY RULING DETERMINING)
RESPONSIBILITY FOR THE RURAL) PETITION TO INTERVENE
CARRIER INTERCONNECTION TO THE)
NEXT GENERATION 9-1-1 SYSTEM)

South Dakota Network, LLC's Petition to Intervene

South Dakota Network, LLC ("SDN") hereby petitions the South Dakota Public Utilities Commission ("Commission") for intervention in the above captioned proceeding pursuant to SDCL 1-26-17.1 and ARSD 20:10:01:15.02, 20:10:01:15.03 and 20:10:01:15.05. In support hereof, SDN states as follows:

1. SDN is a limited liability company with its principal place of business at 2900 West 10th Street, Sioux Falls, South Dakota 57104. SDN provides various telecommunications services, including, but not limited to centralized equal access services, lease of facilities to various interexchange carriers and transport services.

2. On October 27, 2017, the South Dakota Department of Public Safety through the State 911 Coordination Board (hereinafter "911 Coordination Board") filed with this Commission a Petition for Declaratory Ruling with the Commission. The Petition requests a ruling from the Commission on the following question:

[W]hether it is NextGen or the rural carriers comprising SDTA that has the responsibility to transport 911 traffic between the rural carrier's service areas and NextGen's centralized points of interconnection.

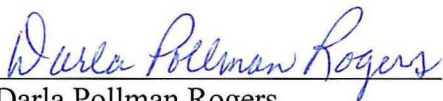
3. SDN currently leases capacity (DS-3s) to NextGen in Rapid City and Sioux Falls, thereby provisioning NextGen with the capacity to transport 911 traffic to selective routers in Raleigh, North Carolina and Dallas, Texas.

4. SDN has an interest in this docket because, as an independent network, SDN has the ability and capacity to lease sufficient circuits to NextGen to enable NextGen to aggregate and transport all 911 calls originating from SDTA member company end user subscribers to its selective routers in Raleigh, NC and Dallas, TX.

5. SDN supports the common interest of SDTA member companies to ensure that all federal and state laws pertaining to the question articulated in the 911 Coordination Board's Petition are properly considered, interpreted and applied.

WHEREFORE, based on the foregoing, SDN is an interested party in this matter and should be permitted to intervene and participate as a party.

Dated this 9th day of November, 2017.


Darla Pollman Rogers
Riter, Rogers, Wattier, & Northrup LLP
PO Box 280
Pierre SD 57501
Attorney for SDN

CERTIFICATE OF SERVICE

The undersigned, attorney for SDN, hereby certifies that a true and correct copy of this Petition to Intervene was served on this 9th day of November, 2017, upon:

Ms. Patricia Van Gerpen
Executive Director
South Dakota Public Utilities Commission
500 E. Capitol Ave.
Pierre, SD 57501
patty.vangerpen@state.sd.us

Ms. Amanda Reiss
Staff Attorney
South Dakota Public Utilities Commission
500 E. Capitol Ave.
Pierre, SD 57501
amanda.reiss@state.sd.us

Ms. Kristen Edwards
Staff Attorney
South Dakota Public Utilities Commission
500 E. Capitol Ave.
Pierre, SD 57501
Kristen.edwards@state.sd.us

Mr. Joseph Rezac
Staff Analyst
South Dakota Public Utilities Commission
500 E. Capitol Ave.
Pierre, SD 57501
joseph.rezac@state.sd.us


Mr. Patrick Steffensen
Staff Analyst
South Dakota Public Utilities Commission
500 E. Capitol Ave.
Pierre, SD 57501
patrick.steffensen@state.sd.us

Ms. Jenna E. Howell
General Counsel and Director
Department of Public Safety
118 W. Capitol Ave.
Pierre, SD 57501
jenna.howell@state.sd.us

Mr. Kim Robert Scovill
Vice President - Legal and Regulatory, and Assistant Treasurer
NextGen Communications, Inc.
275 West St., Ste. 400
Annapolis, MD 21401
kim.scovill@comtechtel.com

Mr. Rich Coit
Executive Director
South Dakota Telecommunications Association
PO Box 57
Pierre, SD 57501
richcoit@sdtaonline.com

Dated this 9th day of November, 2017.



Darla Pollman Rogers
Riter Rogers Wattier & Northrup
PO Box 280
Pierre SD 57501
Attorney for SDN