

May 22, 2018

Ms. Patty Van Gerpen, Executive Director  
South Dakota Public Utilities Commission  
500 East Capitol Ave.  
State Capitol Building  
Pierre, SD 57501

**RE: Docket TC18-012 (TC18-012 - In the Matter of the Application of Intermedia Voice Services, Inc. for a Certificate of Authority to Provide Local Exchange and Interexchange Long Distance Services in South Dakota)**

Dear Ms. Van Gerpen:

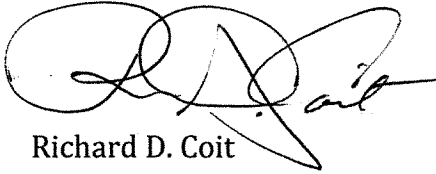
Regarding the above referenced docket and the "Application" filed by Intermedia Voice Services, Inc. (Intermedia), SDTA would submit the following comments.

Within paragraph (9) of its filed Application Intermedia states that "the Applicant requests authority to provide service throughout the state of South Dakota, excluding those areas served by a rural telephone company." [*Emphasis added*]. Paragraph (15) of the Application states, however, that while Intermedia "is not seeking to interconnect directly with rural carriers, [it] will offer services in any location where its underlying carriers are permitted to interconnect."

As of this time, SDTA gives primacy to the clear language of paragraph (9), referenced above, and the fact that Intermedia has not, to SDTA's knowledge, provided notice of its Application for local exchange service certification to any SDTA rural telephone company members (as is required pursuant to ARSD § 20:10:32:04) and takes the view that Intermedia is not at this time seeking local exchange certification for any rural telephone company service areas in South Dakota. Should it later become evident that SDTA has misinterpreted Intermedia's Application and the company is, in fact, seeking a statewide local exchange certification that extends to rural telephone company service areas, SDTA reserves the right to submit a late-filed Petition to Intervene in this matter as is allowed under the provisions of ARSD § 20:10:01:15.02. If any rural service areas are made part of the Application, Intervention may be necessary to ensure that all rural safeguard provisions related to competitive entry and local interconnection into rural telephone company service areas are considered in the review of Intermedia's Application for local exchange certification.

Thank you for your assistance in filing and distributing copies of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Richard D. Coit', written in a cursive style.

Richard D. Coit  
SDTA Executive Director and General Counsel

CC: Service List