

## EXHIBIT B



January 5, 2016

Ms. Loree Parker  
Transport Engineer  
Telecommunications Systems, Inc.  
Email: [TransportTeam@telecomsys.com](mailto:TransportTeam@telecomsys.com)

Venture Communications Telephone Company is in receipt of the recent Telecommunications Systems, Inc. (TCS) correspondence captioned an "LOA-CFA" which is put forth as an "authorization" for Venture Communications Telephone Company to order 911 circuits or trunks to TCS's centralized points of interconnection (POIs) in Rapid City and/or Sioux Falls, South Dakota.

Please note in regards to your "LOA-CFA" letter that Venture Communications Telephone Company believes TCS is responsible for ordering the related circuits/trunks from a meet point location within Venture Communications Telephone Company rural service area to its designated centralized point(s) of interconnection and, accordingly, TCS is asked to promptly submit a completed "Access Service Request (ASR)" form. This will aid us in jurisdictionally classifying the desired transport services, for regulatory purposes, and also enable us to render an appropriate billing for such services.

As was referenced by the South Dakota Telecommunications Association during a meeting of the South Dakota Public Utilities Commission on December 22, 2015, the "rural transport rule" provisions found in 47 CFR Section 51.709 supports our position that rural ILECs are not obligated to transport local or "non-access" traffic to locations outside the boundaries of their service areas.

Once an ASR is received in our office, we can begin the process of establishing the circuits/trunks necessary for origination of the 911 traffic.

Best Regards,

A handwritten signature in blue ink that reads "Randy Houdek".

Randy Houdek  
Venture Communications Telephone Company  
PO Box 157  
Highmore, SD 57345