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May 1st, 2019

Patricia Van Gerpen, Executive Director
South Dakota Public Utilities Commission
500 East Capital Avenue
Pierre, SD 57501

RE: Valley Telephone Company, South Dakota Annual ETC Certification Filing
Waiver

Dear Ms. Van Gerpen:

Valley Telephone Company (Valley) respectfully requests a waiver of the Commission's filing requirements under ARSD 20:10:32:56 of the Commission rules. Valley currently has 171 voice subscribers in the West Browns Valley exchange and finds the ETC certification process in South Dakota to be unduly burdensome and unnecessary for this small number of customers. Valley files annually with Minnesota Public Utilities Commission for ETC Certification and believes their review and approval of Valley's ETC filing for the majority of subscribers should be sufficient. A copy of the Minnesota Public Utilities Order Certifying ETCs issued October 24, 2018 is attached.

As the General Manager of Valley, I affirm Valley utilized the universal service funds received in 2018 and will spend the 2020 funds for the provision, maintenance and upgrading of facilities and services for which such support is intended. However, Valley previously deployed fiber to the customers in South Dakota so not much funding will be spent directly on these 171 customers but rather for the equipment provisioned to provide service to our entire study area.

Valley was previously designated an Eligible Telecommunications Carrier (ETC) by the Commission in the past and requests the Commission include Valley in its certification to the Universal Service Administrative Company and the Federal Communications Commission based on this request.

If you have any questions about this filing, please contact Mary T. Buley at Olson & Thielen, Inc, mbuley@otcpas.com.

Sincerely,

Dave Bickett, General Manager
Valley Telephone Company
P.O. Box 277
Underwood, MN 56586

Enclosures

CC: Mary T. Buley, Olson & Thielen Company