

**BEFORE THE  
SOUTH DAKOTA PUBLIC UTILITIES COMMISSION**

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<b>IN THE MATTER OF THE REQUEST OF</b>	)	
<b>INTERSTATE TELECOMMUNICATIONS</b>	)	
<b>COOPERATIVE, INC. (F/K/A SSTELECOM, INC.)</b>	)	<b>ANNUAL ETC</b>
<b>FOR CERTIFICATION REGARDING ITS USE</b>	)	<b>CERTIFICATION FILING</b>
<b>OF FEDERAL UNIVERSALSERVICE</b>		
<b>SUPPORT.</b>		

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*Interstate Telecommunications Cooperative, Inc. (F/K/A SSTELECOM, Inc.)* (The “Company”), by and through its attorney, makes this filing to seek certification from the South Dakota Public Utilities Commission (the “Commission”) to comply with the provisions of ARSD§§20:10:32:52 and 20:10:32:54 of the Commission’s rules pertaining to eligible telecommunications carriers (“ETCs”).

In accordance with 47 C.F.R. §54.314, federal universal service high cost support provided to carriers will be made available only if the State Commission files the requisite annual certification with the FCC and USAC. The certification required specifically for non-rural carriers and/or eligible telecommunications carriers serving lines in the service area of a non-rural carrier to receive federal high cost universal service support for all four quarters during calendar year 2020 is currently due to be filed with the FCC and USAC on or before October 1, 2019. The certification may be presented to these entities in the form of a letter from the State Commission. The letter must identify which carriers in the State are eligible to receive federal high cost support during the 12 month period and must certify that the carriers listed will only use the support for the provision, maintenance and upgrading of facilities and services for which the support is intended.

As part of its annual request to the Commission for certification, the Company provides the following information:

1. The Company is a non-rural telephone company that has previously been designated by this Commission as an ETC. The Company provides: (A) local exchange voice services to approximately 799 access lines; and (B) broadband services to approximately 865 customer locations within its established non-rural service area(s), in South Dakota. These services include all the essential services that are included in the federal definition of universal service.

2. The provisions of ARSD§20:10:32:54 addressing the annual “Certification requirements” adopted by this Commission indicate in part that the ETC must show “how much universal service support was received.” Accordingly, the Company’s 2018 federal universal service receipts are reflected on Exhibit A hereto (presented as part of the Company’s “Progress Report” required by ARSD§20:10:32:54(2)). This same Exhibit also shows total expenditures made by the Company in 2018 relating to the provision, maintenance and upgrading of facilities and services for which universal service support is intended under federal law. In addition, to the extent that the Company’s actual capital investments in 2018 differ from the 2018 planned investment information earlier provided to this Commission (as part of the two-year “service quality improvement plan” filed in 2017) the differences are noted in Exhibit A. Estimates of the expenditures to be made by the Company for calendar year 2020, related to the provision, maintenance, and upgrading of facilities and services supported by federal universal service, are provided on Exhibit B hereto as part of the Company’s current Two-Year Plan associated with ARSD§20:10:32:54(1). Consistent with federal universal service principles, the Company will use federal universal service support amounts thus far received in

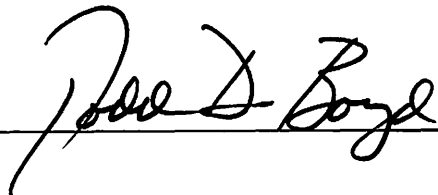
2019 to meet the objectives identified in its service quality improvement plans and will continue to do so with respect to universal service amounts received in 2020. This use of federal universal service support will enable the Company to: (1) maintain rates for its local exchange services that are affordable and reasonably comparable to rates being charged for the same services in urban areas; and (2) to upgrade its telecommunications facilities and equipment as necessary to meet evolving service requirements, including those related to broadband services, and maintain high quality service. The use of federal universal service support for these purposes is clearly consistent with the federal universal service provisions.

3. Lastly, also attached is Exhibit C a document containing the certifications required under the provisions of ARSD §§20:10:32:54(6) and 20:10:32:54(7). Consistent with the Commission's Order Waiving ETC Certification Requirements issued on May 2, 2019 in Docket AA19-01, the remaining ETC certification rule provisions found in ARSD §§ 20:10:32:54(8) and 20:10:32:54(9) have by Order been waived by this Commission.

4. Based on all the foregoing information, including all information provided within Exhibits A, B, C and D (attached hereto), the Company requests that this Commission issue an appropriate certification to the FCC and USAC indicating that the Company is in compliance with 47 U.S.C. § 254(e) and should receive all federal high cost universal service support determined for distribution to the Company in 2019. In order to ensure that this certification is issued to the FCC prior to October 1, 2019, the Company would further ask the Commission to expedite this process, to the extent needed to meet such deadline.

Respectfully submitted,

Dated this 18<sup>th</sup> day of June 2019.



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Title

Attorney

## **EXHIBIT A**

**Attached are (1) a copy of Interstate Telecommunications Cooperative, Inc. (FKA SSTELECOM) progress report.**

**Confidential Exhibit A ITC SSTELECOM 2019 ETC Filing.pdf**

## **EXHIBIT B**

**Attached are (1) a copy of Interstate Telecommunications Cooperative, Inc. (FKA SSTELECOM) two-year plan.**

**Confidential Exhibit B ITC SSTELECOM 2019 ETC Filing.pdf**

## **EXHIBIT C**

**Attached are (1) a copy of Interstate Telecommunications Cooperative, Inc. (FKA SSTELECOM) outages, Unfilled Requests and Complaints.**

**Confidential Exhibit C ITC SSTELECOM 2019 ETC Filing.pdf**