BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF SOUTH DAKOTA

In the Matter of the Application of Qwest	Docket No.	
Corporation dba CenturyLink QC for		
Waiver of Switched Access Cost Study		

QWEST CORPORATION DBA CENTURYLINK QC'S APPLICATION FOR WAIVER OF SWITCHED ACCESS COST STUDY

Qwest Corporation dba CenturyLink QC ("CenturyLink") respectfully requests that the Commission grant a waiver, under ARSD § 20:10:27:02, of the requirement to perform a switched access cost study. As grounds therefore, CenturyLink states:

ARSD § 20:10:27:02 requires a carrier's carrier to file cost data in support of its switched access tariff no less than once every three years. The rule also provides that the Commission may, for good cause shown, either on its own motion or by application from a carrier's carrier, temporarily waive or suspend any rule in Chapter 20:10:27. CenturyLink notes that the Commission has in the past routinely granted such waivers for CenturyLink and other carriers.

CenturyLink requests a waiver of the cost study requirement because (1) many access rates are limited by the federal ruling in the USF/ICC Transformation Order;¹ (2) producing such a study is costly and consumes a great deal of resources; (3) CenturyLink does not intend to increase access rates at this time; and (4) preliminary analysis based on past studies indicates that a cost study would likely justify higher rates than those from the last submitted study.

¹ Report and Order and Further Notice of Proposed Rulemaking, *In the Matter of Developing a Unified Intercarrier Compensation Regime*, CC Docket 01-92, CC 11-161, released November 18, 2011.

CenturyLink has filed similar requests for waivers in the past, and the Commission has granted those requests in Docket Nos. TC14-001, TC11-002 and TC11-002.

WHEREFORE, CenturyLink respectfully asks the Commission to temporarily waive or suspend the requirement in ARSD § 20:10:27:07 for the current period, based on the good cause recited above.

Dated this 28th day of January, 2020.

QWEST CORPORATION DBA

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