

3. The Company also provides the Commission with a "two-year service quality improvement plan" in Exhibit B as required by ARSD § 20:10:32:54(1) including planned expenditures for calendar years 2021 and 2022 relating to the provision, maintenance, and upgrading of facilities and services for which universal service support is intended.

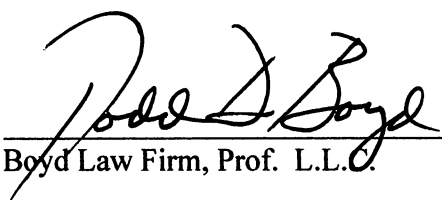
4. *The Company* is using federal high cost universal service support amounts thus far received in 2020 to meet the objectives identified in previously filed service quality improvement plans and will continue to do so with respect to universal service amounts received in 2021. This use of federal universal service support will enable the Company to: (A) 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 (B) 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 high cost universal service support for these purposes is clearly consistent with the federal universal service provisions.

5. 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 April 2, 2020 in Docket AA20-001, 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.

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§ 254(e) and should receive all federal high cost universal service support determined for distribution to the Company in 2021. In order to ensure that this certification is issued to the FCC prior to October 1, 2020, the Company would further ask the Commission to expedite this process, to the extent needed to meet such deadline.

Respectfully submitted,

Dated this 10th day of June 2020.



Boyd Law Firm, Prof. L.L.C.

Title Attorney

ITC F/K/A SSTELECOM