

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA**

**IN THE MATTER OF THE APPLICATION OF)
BIF IV INTREPID OPCO, LLC)
FOR A CERTIFICATE OF AUTHORITY TO) TC22-055
PROVIDE INTEREXCHANGE SERVICE IN THE)
STATE OF SOUTH DAKOTA)**

SDTA Petition to Intervene

The South Dakota Telecommunications Association ("SDTA") hereby petitions the Commission for intervention in the above captioned proceeding pursuant to SDCL 1-26-17.1 and ARSD §§ 20:10:01:15.02, 20:10:01:15.03 and 20:10:01:15.05. In support hereof, SDTA states as follows:

1. SDTA is an incorporated organization representing the interests of numerous cooperative, independent and municipal telephone companies operating throughout the State of South Dakota.

2. On or about August 31, 2022, BIF IV Intrepid OpCo, LLC (hereinafter referenced as "Intrepid" or "Applicant") filed an Application with the Commission, pursuant to the provisions of ARSD §§ 20:10:32:03 and 20:10:24:02, seeking authority to provide telecommunications services via a fiber-based network "throughout the entire state of South Dakota."

3. The Application indicates that Intrepid does not intend to provide traditional switched local exchange service offer voice service. However, it indicates the possibly of providing such services in the future.

4. All of the SDTA member companies operate as "rural telephone companies" for purposes of the Federal Telecommunications Act of 1996 and also the state laws enacted in 1998 addressing local exchange competition (SDCL § 39-31-69, et. seq.). Based on the geographic

scope of Intrepid's Application, SDTA believes that all its member local exchange carriers (LECs) have an interest in and stand to be impacted by this proceeding.

5. SDTA seeks intervention herein based on the individual interests of each of its member ILECs and based on their common interests to ensure that the rural safeguard provisions contained in federal and state laws are carefully considered.

6. SDTA is an interested party in this matter and seeks intervening party status.

Dated this 15 day of September 2022.

Respectfully submitted:

/s/ Kara Semmler
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