

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

**IN THE MATTER OF THE APPLICATION OF BARR)
TELL USA, INC FOR CERTIFICATE OF AUTHORITY)
TO PROVIDE LOCAL EXCHANGE AND)
INTEREXCHANGE LONG DISTANCE SERVICE IN) **TC24-039**
THE STATE OF SOUTH DAKOTA)
)
)**

SDTA Petition to Intervene

The South Dakota Telecommunications association (SDTA) hereby petitions the Public Utilities Commission (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, 20:10:01:15.04 and 20:10:01:15.05. In support hereof, SDTA states as follows:

1. SDTA is an incorporated organization representing the interests of certain cooperative, independent, municipal, and tribal telephone companies operating throughout the State of South Dakota. All SDTA member companies operate as local exchange companies under state law (SDCL § 49-31-69, et. seq.) in addition to “rural local exchange telephone companies” (RLEC) and "eligible telecommunications carriers" (ETC) under the Federal Telecommunications Act of 1996 and applicable state laws.

2. On or about July 17, 2024, Barr Tell USA, Inc. (“Barr Tell” or “Applicant”) filed an application for a Certificate of Authority to provide local exchange services and interexchange long distance services in the State of South Dakota.

3. SDTA members have an interest in and stand to be impacted by this proceeding based on the geographic scope of Barr Tell's request for authorization to serve.

4. 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 and incorporated into any Commission Order that may result from Barr Tell's application.

5. Based on the foregoing, SDTA alleges that it is an interested party in this matter, and it seeks intervening party status.

Dated this 24 day of July 2024.

/s/ Kara Semmler

Kara Semmler, General Counsel
South Dakota Telecommunications Association
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CERTIFICATE OF SERVICE

I hereby certify that an original of the Petition for Intervention, dated July 24, 2024, filed in PUC Docket TC24-039 was served upon the PUC electronically, directed to the attention of:

Ms. Patty Van Gerpen, Executive Director
South Dakota Public Utilities Commission
patty.vangerpen@state.sd.us

A copy was also sent by e-mail to each of the following individuals:

Amanda Reiss Staff Attorney amanda.reiss@state.sd.us	Brittany Mehlhaff Staff Analyst brittany.mehlhaff@state.sd.us
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	Harold Barr, President Barr Tell, Inc hb@bartell.com
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Dated this 24 day of July 2024

/s/ Kara Semmler
Kara Semmler, General Counsel
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